Inspection Report Cover Sheet for RCRA Contractor Inspections in Iowa

TO BE COMPLETED BY THE ENSV ADMINISTRATIVE ASSISTANT. Please complete one cover sheet per original inspection report and affix this cover sheet to the top of the report.

1. Your name: Donna Arnold
2. Date document was submitted to the Records Center (MM/DD/YY): 7/3/12
3. a. Facility/Company or Site Name: Industrial Laminates/Norplex Inc.

   b. Facility address: 665 Lybrand St, Postville, IA

   c. EPA ID number: IAD073489288
4. Inspection Date(s): 5/14/12
5. Inspector's Name and Division/Branch: Gary Witkovski, EFOB/ENSV
6. Applicable Program (RCRA/Multimedia, etc.): RCRA
7. Number of pages in the inspection report: 241

NOTES TO RECORDS CENTER:

- Please scan and process this report in accordance with the "PROCEDURE FOR DIGITIZING AND COPYING INSPECTION REPORTS (7/6/07).
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516483

ENSV Inspection Transmittal Summary Report

Media:
RCRA CONTRACTO

Inspection Type:
CEI

Inspection Date:
05/14/2012

Preliminary SNC Findings:

Inspector:
TTE CONTRACTOR TTE CONTRACTOR

Transmittal Date:

NOV / NOPV / NOPF:
Yes

Facility Name:
Industrial Laminates/norplex Inc

Address:
665 Lybrand St
Postville
IA
52162

ID Number:
IAD073489288

Activity Number:

MM Participationg Progams:
A,R

Federal Activity:
Laminated Plastics Plate, Sheet (except Packaging), and Sha

Federal Facility:
No

Potential EJ:
No

SBREFA Provided:	Security Handout Provided:	MM Screening Completed:	EMS ISO 14001:	Compliance Officer:
Yes	Yes	Yes	No	BETH KOESTERER

Selection Criteria 1:
IA LQG

Selection Criteria 2:

ACS Code:
RCRA02

Inspection Findings:

1) Failure to label used oil tank as "used oil"
2) Failure to close containers of universal waste lamps
3) Failure to conduct weekly inspections of CSAs
4) Failure to conduct annual RCRA training
5) Failure to transport used oil filters to a recognized recycling center

Target Quality:

N/A

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

INDUSTRIAL LAMINATES/NORPLEX INC.
665 Lybrand Street
Postville, Iowa 52162
563-864-4232

EPA ID Number: IAD073489288

On

May 14, 2012

By

TETRA TECH EM INC.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Environmental Services Division

INTRODUCTION

At the request of the Environmental Services Division and the Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA) Region 7, Tetra Tech EM Inc., (Tetra Tech) conducted a hazardous waste compliance evaluation inspection (CEI) at Industrial Laminates/Norplex Inc. (Industrial Laminates), located at 665 Lybrand Street, Postville, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. As requested by the EPA compliance officer for the facility, the CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements. This report and its attachments present the results of the RCRA CEI. Tetra Tech also conducted a Level B multimedia screening inspection at Industrial Laminates. The Multimedia Screening Checklist is included as Attachment 1.

PARTICIPANTS

Industrial Laminates:

Alan Johnson, Plant Manager
Tim Delaney, Product Development Engineer
Dixie Doeppke, Human Resources Director
Pat Harms, Facility Engineer
Dave Lensing, Production Manager

Tetra Tech:

Heather K. Wood, Geologist, 816-412-1787

INSPECTION PROCEDURES

Prior to the CEI at Industrial Laminates on May 14, 2012, I conducted a drive-by inspection. I did not observe any areas of concern during the drive-by. I entered the front entrance of the building and met the receptionist, who called Mr. Alan Johnson. Mr. Johnson escorted me to his office, where we were joined by Mr. Tim Delaney. I presented my business card and EPA credentials letter, and explained the procedures for the CEI. I also explained the facility's right to make confidentiality claims and provided Messrs. Johnson and Delaney the Confidentiality Notice (Notice), which they read. I stated that, at the conclusion of the CEI, they would be given an opportunity to make or not make a claim of confidentiality for the facility. I also provided Messrs. Johnson and Delaney a copy of U.S. Federal Code 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining my inspection authority. Both of these they read.

A copy of each of the following documents was left at the facility during the inspection:

- Inspection letter and EPA representative Mr. Gary Witkovski's business card
- U.S. Federal Code 1001 and 1002 and RCRA Section 3007
- EPA's "Instructions for Responding to a Notice of Preliminary Findings"
- EPA's "Supplemental Information for Small Businesses Subject to an U.S. EPA Enforcement Action"
- Iowa Department of Natural Resources (IDNR) "Iowa Environmental Guide for Business"
- EPA Small Business Ombudsman's "Publications for Small Businesses" (January 2006)
- EPA's "Hazardous Waste Requirements for Large Quantity Generators" (EPA530-F-96-032)
- EPA's "U.S. EPA Small Business Resources Information Sheet" (EPA-300-F-11-006)
- EPA's Compliance Assistance Centers "Innovative Solutions to your Environmental Challenges"
- IDNR's "Pollution Prevention Services"
- EPA's "Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouse of Chemicals" (December 2001)
- "Commercial Motor Vehicle Transportation System Security & Safety: CMV Transportation Security Planning"
- EPA's "The National Compliance Assistance Clearinghouse"

- Iowa Waste Reduction Center's "On-Site Review Program"
- EPA's "RCRA Online: A Quick Reference Guide" (EPA530-F-08-005)
- EPA's "Industry Sector Notebooks" (EPA310-F-05-001)
- EPA's "Universal Wastes" (http://www.epa.gov/osw/hazard/wastetypes/universal).

I reviewed the RCRA Info Data Verification Handler Information Report with Mr. Johnson, and I updated the types of regulated activity and the hazardous wastes handled (see Attachment 2). I conducted the visual inspection of the facility, accompanied by Messrs. Johnson and Delaney. According to Mr. Johnson, I would not be allowed to take photographs in the compounding area, in the still room, or immediately adjacent to the polymer impregnation units (treaters) because of the risk of explosion from the flash. I was able to photograph the still room from outside the room. I also conducted a review of the facility's records, including manifests, biennial hazardous waste report, waste characterization documentation (including material safety data sheets [MSDS]), training documentation, and the contingency plan. Facility information gathered during the CEI is documented on the Data Gathering Worksheets and Checklists (see Attachment 3).

During the exit briefing at the conclusion of the CEI, Mr. Johnson and I were joined by Ms. Dixie Doeppke and Messrs. Pat Harms and Dave Lensing. I summarized my findings to Messrs. Johnson, Harms, and Lensing and Ms. Doeppke. I provided a Receipt For Documents And Samples, which Mr. Johnson signed, acknowledging receipt (see Attachment 4). I also provided Mr. Johnson the Notice, which he signed to indicate no confidential business information (CBI) had been provided (see Attachment 5). I then provided Mr. Johnson a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment 6). A map of the facility is included as Attachment 7. Of the 34 photographs taken during the CEI, 32 are included in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Industrial Laminates manufactures a variety of industrial-grade laminates. Paper or cloth (cotton, linen, or glass) are used as base materials to produce a laminated product. The raw material is impregnated with a phenolic or epoxy resin and finished with melamine or other surface coatings. Raw materials used by Industrial Laminates also include solvents, pigments, resins, and other polymers. The facility began operations at this location in approximately 1975.

Industrial Laminates currently employs approximately 185 full-time staff, working three 8-hour shifts from midnight to 8 a.m., 8 a.m. to 4 p.m., and 4 p.m. to midnight, Monday through Friday. Industrial Laminates occupies a main building with three large storage outbuildings, with approximately 148,000 square feet under roof altogether (see Attachment 7 and Attachment 8, Photographs 1 and 2). Tank storage for raw materials is all under roof.

Industrial Laminates uses dozens of formulations of laminating polymers. Raw materials are mixed in one of three compounding kitchens, one for epoxy #1, one for epoxy #9, and one for all other mixtures. Altogether, the facility has approximately 12 mixing vessels in the compounding areas. The mixed polymer is piped to one of eight treaters, two vertical and six horizontal. According to Mr. Delaney, the two vertical treaters are mostly dedicated to either #1 or #9 epoxy, whereas the horizontal treaters are used for a wider range of polymers.

The treaters are used to impregnate sheets of paper, cotton, linen, or glass cloth. The sheets are layered, pressed in a series of rollers, and baked off in an oven. According to Mr. Delaney, the polymer is recirculated through the treaters, and fresh material is added as it is consumed by the impregnating process. When the run is concluded, any remaining polymer ("scrap") is pumped out into a 55-gallon container. The pan and other equipment are cleaned with a solvent, usually acetone. For melamine treaters only, hot water is used. This spent solvent or wash water is also pumped out into a drum ("wash"). The melamine scrap and wash are considered hazardous based on process and product knowledge and testing; these are managed as a single waste stream (melamine waste). All other scrap (phenolic epoxy or anhydride scrap) is considered hazardous based on process and product knowledge and testing. Wiping and cleaning equipment also generates used solvent rags, which the facility considers hazardous based on process and product knowledge and testing. Cutting and shaping the finished product generates waste laminate, which is considered nonhazardous based on product and process knowledge.

The used wash solvent is classified, based on its formulation, into one of two categories: (1) "in-process materials" that can be reclaimed in an on-site distillation unit (still) (see Attachment 8, Photograph 3) or (2) waste, which is consolidated with the non-melamine scrap material. Whether the material can be reclaimed depends on the viscosity of the material and the ease with which it can be distilled. The facility has lists of materials that cannot be reclaimed posted throughout the facility; this sign was included as an attachment to the amendment to the facility's Biennial Report, which I reviewed before the inspection (see Attachment 9, Page 16). Used solvent designated for reclamation is accumulated in containers around the facility. The facility considers this used solvent a hazardous secondary material exempt from

the definition of solid waste (see Section 3). The still bottoms generated during the reclamation process are considered hazardous waste based on product and process knowledge. Any other solids generated during mixing or straining of raw materials are consolidated with the still bottoms.

The facility also has an on-site laboratory; this is used both for research and development (R&D) and quality control (QC). Activities in the laboratory also generate phenolic epoxy scrap, which is consolidated with the scrap from the production areas. Disposal of off-specification chemicals or used reagents generates laboratory waste, which the facility considers hazardous based on process and product knowledge.

The facility does not maintain any vehicles on site, including the facility's forklifts and forktrucks, which are maintained by an off-site contractor. Maintenance of the hydraulic rollers and presses generates used oil and used oil filters, which the facility considers nonhazardous and manages as used oil. Maintenance of the facility building and equipment generates used parts washer solvent, used batteries, and used lamps, which the facility considers hazardous, and empty containers (drums) and general trash, which the facility considers nonhazardous—all based on product and process knowledge.

The facility also generates hazardous waste from performing corrective action for contaminated groundwater. According to Mr. Johnson, groundwater beneath the facility had become contaminated with solvents when the facility was operated by Allied Signal. Groundwater is pumped from extraction wells and contained, pending analytical results. The facility considers this remediation-derived well water hazardous, based on analytical results, and it is collected from the facility for off-site disposal.

In May 2007, EPA contractor Tetra Tech conducted a CEI at Industrial Laminates. During the 2007 CEI, the following preliminary findings were made:

- Failure to close containers of universal waste lamps, as required by Title 40 *Code of Federal Regulations* (40 CFR) 273.13(d)(1).
- Failure to label five containers of universal waste lamps as "Universal Waste—Lamps," "Waste Lamps," or "Used Lamps" as required by 40 CFR 273.14(e).

2. RCRA Status

The RCRA Info Data Verification Handler Report provided by EPA (see Attachment 2) indicates that Industrial Laminates is a large quantity generator (LQG) generating more than 1,000 kilograms (kg) of hazardous waste per month. Based on my review of manifests, the 2011 Biennial Hazardous Waste

Report obtained before the CEI (see Attachment 9), and information provided by Messrs. Johnson and Delaney, I concluded that Industrial Laminates is operating as a LQG of hazardous waste. Per month, Industrial Laminates currently generates approximately 1,600 kg of non-melamine scrap (D001, F003, F005), approximately 2,400 kg of melamine waste (D001, F003, F005), and approximately 400 kg each of still bottoms (D001, F003, F005) and used solvent rags (D001, F003, F005). The facility is also a used oil generator and a small quantity handler of universal waste (accumulating less than 5,000 kg of universal waste at any time).

At the time of the CEI, the facility was storing hazardous waste in seven less-than-90-day container storage areas (CSA): (1) near Treater 1, (2) in the still room, (3) between Treaters 4 and 6, (4) adjacent to the interior extraction well, (5) adjacent to Treater 8, (6) adjacent to Treater 9, and (7) in the lean shed outbuilding. The facility also accumulates waste in four satellite accumulation areas (SAA).

3. Management of Hazardous Secondary Materials

On March 7, 2012, as required by 40 CFR 260.42 and 261.4(a)(23)(vi), Industrial Laminates notified EPA Region 7 that it intended to claim the exemption to the definition of solid waste described in 40 CFR 261.2(a)(2)(ii) and 261.4(a)(23). The notification was received at EPA on March 12, 2012. Industrial Laminates claimed this exemption for used solvent wash, a hazardous secondary material that is reclaimed at the generator facility. This material is not subject to other exemptions, as required by 40 CFR 261.4(a)(23)(iv). Before the inspection, I reviewed the notifications on file at the EPA Region 7 Records Center (see Attachment 9, Pages 14 and 15). I inspected the facility for the requirements for this exemption (see Attachment 10).

Used solvent wash generated from cleaning treater pans and equipment is reclaimed in a still operated by the Industrial Laminates facility. As required for the exemption by 40 CFR 40 CFR 262.2(c)(1)(A) and (B), it is not burned, applied to the land, or otherwise used in a manner constituting disposal. The still is under the control of the generator, as required by 40 CFR 261.4(a)(23)(ii).

Before its reclamation, used solvent is held in containers that control the movement of the solvent into the environment (see Attachment 8, Photographs 4 through 6), as required by 40 CFR 261.4(a)(23)(i). These containers are equivalent to the containers used to hold other raw materials at the facility, and they are labeled with their contents.

As required for the exemption by 40 CFR 261.4(a)(23)(iii), the facility does not speculatively accumulate solvent for reclamation. The facility maintains a log of distillation runs, tracking the amount and type of solvent recovered (see Attachment 11). Each run begins with a 55-gallon container of used solvent wash. During the inspection, I observed approximately 10 containers of in-process material.

The facility is legitimately reusing the solvent reclaimed, as required by 40 CFR 261.4(a)(23)(v). Reclaimed solvent is pumped into a 200-gallon tank in the compounding area. The tank was in good condition and labeled as "ace wash." According to Mr. Delaney, all of the reclaimed solvent is used, but the facility uses approximately 95 percent virgin solvent because of the relatively small amount of reclaimable used solvent wash generated by the facility.

As a result of my inspection, I concluded that the facility had met the requirements for the exemptions in 40 CFR 261.2(a)(2)(ii) and 261.4(a)(23). Thus the used solvent wash that I observed in 55-gallon containers around the facility is exempt from the definition of solid waste, and, therefore, exempt from the management requirements in 40 CFR 262.34(a) and 262.34(c).

4. Waste Streams

This section of the CEI describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, on-site management, and ultimate disposition. The following discussion of waste streams is based on the visual inspection and on conversations with Messrs. Johnson and Delaney. During the visual inspection, I was accompanied by Messrs. Johnson and Delaney. The visual inspection included the laboratory, the compounding area, the three outbuildings, the maintenance areas, the seven less-than-90-day CSAs, and the four SAAs. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

Scrap is generated when polymer pans and treater equipment is cleaned with solvent, both during and at the end of a production run. This waste stream includes all non-melamine scrap (phenolic epoxy scrap and anhydride scrap). The facility considers this material hazardous (D001, F003, F005) based on product and process knowledge and testing; Attachment 12 includes the MSDSs for the most commonly used polymers and waste profile for the scrap. Acetone and toluene are the solvents most commonly used by the facility for cleaning. In 2011, the facility generated approximately 43,000 pounds of scrap (see Attachment 9). The scrap is collected by Savannah Transport and taken to the RINECO facility in Benton, Arkansas. It was last collected on April 20, 2012 (see Attachment 13, Pages 1 and 2).

During the inspection, I observed scrap in three containers in the product testing SAA in the laboratory (see Attachment 8, Photograph 7). The containers were closed, labeled as "hazardous waste," and in good condition. Altogether, the three containers held approximately 6 gallons of waste. I also observed scrap in 55-gallon containers in five of the seven CSAs:

- One container in the Treater 1 CSA (see Attachment 8, Photograph 4)
- 12 containers in the still room (see Attachment 8, Photographs 3, 8, and 9)
- Two containers in the Treater 4-6 CSA (see Attachment 8, Photograph 6)
- One container in the Treater 9 CSA (no photograph)
- 67 containers in the lean shed CSA (see Attachment 8, Photograph 10).

All containers were closed, in good condition, dated, and labeled as "hazardous waste." The oldest container of scrap that I observed was in the lean shed and was dated March 29, 2012.

Melamine waste is generated from disposal of spent melamine polymer, which cannot be reclaimed in the still, and the wash water used to clean the treater. The facility considers this material hazardous (D001, F003, F005) based on product and process knowledge and testing. In 2011, the facility generated approximately 63,000 pounds of melamine waste (see Attachment 9). It is collected by Savannah Transport and taken to the RINECO facility in Benton, Arkansas. It was last collected on April 20, 2012 (see Attachment 13, Pages 1 and 2).

During the inspection, I observed melamine waste in one 55-gallon container in the Treater 4-6 CSA (see Attachment 8, Photograph 6) and 12 containers in the lean shed CSA (see Attachment 8, Photograph 10). All containers were closed, in good condition, dated, and labeled as "hazardous waste." The oldest container of melamine waste that I observed was in the lean shed and was dated April 19, 2012.

Used solvent rags are generated when rags are used to wipe down treaters after use, and during cleaning of equipment. The facility considers this material hazardous (D001, F003, F005) based on product and process knowledge and testing. Acetone and toluene are the solvents most commonly used by the facility for cleaning. In 2011, the facility generated approximately 10,000 pounds of used solvent rags (see Attachment 9). The used solvent rags are collected by Savannah Transport and taken to the RINECO facility in Benton, Arkansas, for disposal. They were last collected on April 20, 2012 (see Attachment 13, Pages 1 and 2).

During the inspection, I observed used solvent rags in a 7.5-gallon container in the SAA in the compounding area. The container was closed, labeled as "hazardous waste," and in good condition. I also observed used solvent rags in 55-gallon containers in four of the seven CSAs:

- Two containers in the still room (see Attachment 8, Photographs 3, 8, and 9)
- One container in the Treater 4-6 CSA (see Attachment 8, Photograph 6)
- One container in the Treater 9 CSA (no photograph)
- Six containers in the lean shed CSA (see Attachment 8, Photograph 10).

All containers were closed, in good condition, dated, and labeled as "hazardous waste." The oldest container of used solvent rags that I observed was in the lean shed and was dated March 14, 2012.

Still bottoms are generated when solvent is reclaimed in the on-site still. Any solid polymer material, such as particulate strained from raw materials or absorbent material swept up during spill cleanup, is also included in the still bottoms waste stream. The facility considers this material hazardous (D001, F003, F005) based on product and process knowledge and testing. Acetone and toluene are the solvents most commonly used by the facility for cleaning. In 2011, the facility generated approximately 10,000 pounds of still bottoms (see Attachment 9). The still bottoms are collected by Savannah Transport and taken to the RINECO facility in Benton, Arkansas, for disposal. They were last collected on April 20, 2012 (see Attachment 13, Pages 1 and 2).

During the inspection, I observed still bottoms in 55-gallon containers in three of the seven CSAs:

- One container in the still room (see Attachment 8, Photographs 3, 8, and 9)
- One container in the Treater 9 CSA (no photograph)
- Three containers in the lean shed CSA (see Attachment 8, Photograph 10).

All containers were closed, in good condition, dated, and labeled as "hazardous waste." The oldest container of still bottoms that I observed was in the lean shed and was dated March 30, 2012.

Waste laminate is generated when finished laminate is cut and shaped. The facility considers this material nonhazardous based on process and product knowledge; Attachment 12 includes the MSDSs for the most commonly used polymers. According to Mr. Johnson, the facility consolidates the waste laminate with the general trash, so the facility does not track a generation rate for this waste stream. The

general trash is accumulated in rollaway containers around the facility, collected by Reliable Dumpster, and transported for disposal to the Winneshiek County Sanitary Landfill in Decorah, Iowa.

Laboratory waste is the spent reagents and off-specification chemicals generated in the facility's R&D and QC laboratory. The primary wastes are spent acids, spent bases, and ethylene dibromide. The facility considers this waste hazardous (D002) based on process and product knowledge. Mr. Johnson estimated that the facility generates approximately 2 gallons of laboratory waste per year, and said that it had not been collected for disposal since September 2009. According to Mr. Delaney, this laboratory waste will be collected by Savannah Transport and taken to the RINECO facility in Benton, Arkansas.

During the inspection, I observed nine 2-gallon containers in a SAA in the chemical storage cabinet adjacent to the laboratory (see Attachment 8, Photographs 11 through 13). This cabinet is used for storage of all chemicals used in the laboratory, including unused and in-use reagents. The nine containers altogether held approximately 6 gallons of waste. All containers were closed, in good condition, and labeled as "hazardous waste."

Used oil is generated during maintenance of the facility's hydraulic equipment. This facility considers this waste nonhazardous based on process and product knowledge. According to Mr. Delaney, the facility generates approximately 9,000 gallons of used oil per year. It is collected by Safety-Kleen Systems (SK) and transported to the SK facility in Davenport, Iowa, for recycling. It was last collected on March 16, 2012, manifested as "oily water" (see Attachment 13, Page 28).

During the inspection, I observed used oil stored in two aboveground storage tanks in a maintenance area. Both tanks were in good condition, and the larger tank (approximately 9,000 gallons) was labeled as "used oil" (see Attachment 8, Photograph 14). However, the smaller tank (approximately 350 gallons) was not (see Attachment 8, Photograph 15). I concluded that the facility had failed to label a used oil storage tank as "used oil," as required by 40 CFR 279.22(c)(1) (**NOPF No. 1**). I provided compliance assistance regarding management of used oil.

Used oil filters are generated during maintenance of the facility's hydraulic equipment. This facility considers this waste nonhazardous based on process and product knowledge, and these are managed as used oil. According to Mr. Delaney, the facility generates approximately 15 used oil filters per year. These are transported by the facility in a single 55-gallon container to Clayton County Recycling, an auto salvage yard in Monona, Iowa, for used oil recycling.

During the inspection, I observed three unpunctured used oil filters draining into the smaller, unlabeled used oil tank (see Attachment 8, Photograph 16). Mr. Delaney estimated that these filters had been generated within a day or two of the inspection. I did not observe any used oil filter storage containers. I provided compliance assistance regarding management of used oil filters.

After the inspection, I attempted to determine if Clayton County Recycling was a recognized used oil collection center, but I could not find it on either the RCRA Information System database maintained by EPA or on the Iowa Department of Natural Resources Financial and Business Assistance listing of recognized automotive recycling centers. As a result, I concluded after the inspection that the facility had failed to transport the used oil filters to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil, as required by 40 CFR 279.24(a)(3) (**NOPF No. 5**). I updated the NOPF and notified Mr. Johnson by email on June 6, 2012.

Used parts washing solvent is generated in the facility's maintenance area in its parts washer. The facility considers this waste hazardous (D039) based on product and process knowledge. The solvent used in the parts washer is SK's premium solvent, which consists primarily of high flash petroleum distillates (see Attachment 14). However, because of the solvent recycling process, this solvent is sometimes contaminated with tetrachloroethene. In 2011, the facility generated 85 gallons of used parts washing solvent (see Attachment 9). The used parts washing solvent is collected by SK and transported to the SK facility in Davenport, Iowa. It was most recently collected on February 29, 2012 (see Attachment 13, Pages 29 and 30).

During the inspection, I observed used parts washing solvent in a 30-gallon SAA container in the maintenance area, adjacent to the parts washer (see Attachment 8, Photograph 17). The container was in good condition, closed, and labeled as hazardous waste.

Used lamps are generated during facility maintenance. The facility uses both green-tipped and silver-tipped tube fluorescent lamps and high-intensity discharge (HID) lamps. The facility considers the green-tipped lamps nonhazardous and the silver-tipped and HID lamps hazardous (D009) based on product knowledge. They are all managed as universal waste. According to Mr. Delaney, the facility generates approximately 500 used lamps per year, and these are collected for recycling two or three times a year by

Retrofit Recycling of Owatonna, Minnesota (see Attachment 15). The date on the bill of lading could not be read, but Mr. Delaney estimated that the last collection had occurred in December 2011.

During the inspection, I observed used lamps in two locations—in the boiler room, where they are accumulated, and in one of the outbuildings (Pole Barn #1), where they are stored. In the boiler room, I observed two containers of 4-foot lamps, one container of high-intensity discharge (HID) lamps, and one container of 8-foot lamps (see Attachment 8, Photographs 18 through 20). In the outbuilding, I observed four containers of 8-foot lamps and one container each of 4-foot and HID lamps (see Attachment 8, Photographs 21 through 25). I estimated that the facility had approximately 100 hazardous lamps in storage at the time of the inspection.

All the containers were labeled as "waste lamps," "waste fluorescent lamps," or "universal waste lamps." All containers were dated, with the oldest date being August 2, 2011. The containers of 4-foot and 8-foot lamps were all closed, but the flaps on the two containers of HID lamps were only tucked closed (see Attachment 8, Photographs 18 and 25). I concluded that the facility had failed to close containers of universal waste lamps, as required by 40 CFR 273.13(d)(1) (**NOPF No. 2**). This finding is repeated from the 2007 inspection. I provided compliance assistance regarding management of used lamps. Containers that had been incorrectly labeled "waste bulbs" had been correctly labeled as "waste lamps" prior to this inspection, according to Mr. Delaney. Universal waste storage areas are included in the facility's regular weekly inspections.

Used batteries are generated during facility maintenance, including nickel-cadmium, lead-acid, and alkaline batteries. The facility considers the used batteries hazardous (D006, D008) based on product knowledge, and these are managed as universal waste. The facility generates approximately 30 gallons of used batteries per year, and these are collected for recycling by Retrofit Recycling of Owatonna, Minnesota (see Attachment 15). Used batteries were not collected during the most recent recycling event. Mr. Delaney estimated that the last collection had occurred in June 2011.

During the inspection, I observed used batteries in two locations—in the server room (see Attachment 8, Photograph 26) and in the maintenance area. Both containers were labeled as "universal waste batteries" and dated June 22, 2011. I estimated that the facility had approximately 10 gallons of batteries in storage at the time of the inspection.

Empty containers are generated when raw materials are drained from containers. Because the containers meet the RCRA definition of empty, the facility considers these nonhazardous waste based on process and product knowledge. The facility does not use any P-listed commercial chemical products that would require triple rinsing the containers. Empty containers are collected in a semi truck trailer outside the outbuildings (see Attachment 8, Photograph 27). If these cannot be reused to hold in-process materials or to serve as SAA or CSA containers, they are collected by Consolidated Container Company of Minneapolis, Minnesota, to be reconditioned or recycled as scrap metal. Mr. Delaney estimated that the facility generates one semi-trailer truckload (approximately 4,000 cubic feet) of empty containers every 4 months.

Remediation-derived well water is generated by the groundwater extraction system operating at the facility. The facility makes a waste determination based on product and process knowledge and remediation investigation analyses. According to the Biennial Report, in the past, the facility has manifested this waste as characteristic (D001, D007, D008) and listed (F003, F005) hazardous waste. In 2011, the facility generated approximately 49,000 pounds of remediation-derived well water (see Attachment 9). It is collected by Veolia Technical Solutions (Veolia) and transported for disposal to the Veolia facility in Port Arthur, Texas, or in Sauget, Illinois. It was last collected on November 7, 2011 (see Attachment 13, Page 23).

During the inspection, I observed a 300-gallon container of remediation-derived well water in the well water CSA (see Attachment 8, Photograph 28). It was in good condition, closed, labeled as "hazardous waste," and dated April 23, 2012.

General facility trash is generated from facility maintenance and cleaning, and includes office trash. The facility considers the general facility trash nonhazardous based on product and process knowledge. General trash includes, but is not limited to, paper, food waste, packaging, and waste laminate. The general trash is collected in a rollaway containers around the facility. Mr. Johnson estimated that the facility generates approximately 10 tons of general trash per week. The general trash is accumulated in rollaway containers around the facility, collected by Reliable Dumpster, and transported for disposal to the Winneshiek County Sanitary Landfill in Decorah, Iowa.

5. Container Storage Areas

I was accompanied by Messrs. Johnson and Delaney to the seven less-than-90-day CSAs. One CSA is located in the outbuilding called the lean shed. The other six CSAs are in the south end of the main

building (the manufacturing CSAs) (see Attachment 7). The facility inspects all seven CSAs as part of a program of weekly inspection, and maintains logs of its inspections (see Attachment 16). I reviewed 3 years of these logs and observed three gaps of more than 1 week:

- August 19, 2011, and September 7, 2011
- September 16, 2011, and September 27, 2011
- December 2, 2011, and December 13, 2011.

I concluded that the facility had failed to conduct weekly inspections of CSAs, as required by 40 CFR 262.34(a)(1)(i) referencing 265.174 (**NOPF No. 3**). I provided compliance assistance regarding inspections of CSA.

The lean shed CSA had 88 full 55-gallon containers of waste (see Attachment 8, Photograph 10), including:

- 12 containers of melamine waste
- 67 containers of scrap
- Three containers of still bottoms
- Six containers of used solvent rags.

The oldest container I observed in this CSA was a container of used solvent rags dated March 14, 2012. I observed spill kits, two fire extinguishers, and a telephone in the building (see Attachment 8, Photographs 29 and 30). The containers had adequate aisle space to observe container condition, and all containers were turned with their labels facing out.

The maintenance CSAs had the following containers in storage:

CSA	Wastes Stored	Oldest Container
Treater 1	• One container of scrap	May 12, 2012
Still Room	• 12 containers of scrap • Two containers of used solvent rags • One container of still bottoms	April 18, 2012 (used solvent rags)
Treater 4-6	• Two containers of scrap • One container of used solvent rags • One container of melamine waste	May 9, 2012 (scrap)
Well Water CSA	• One container of remediation-derived well water	April 23, 2012
Treater 8	• None	
Treater 9	• One container of scrap • One container of used solvent rags • One container of still bottoms	April 12, 2012 (scrap)

These CSAs share a spill kit, which is kept just outside the still room (see Attachment 8, Photograph 31). The building is plumbed with a sprinkler system, and most CSAs also have a nearby fire extinguisher (see Attachment 8, Photographs 8 and 32). Telephones are located in the lunch room near the Treater 1 CSA, next to the spill kit, adjacent to the Treater 4-6 CSA, and just outside the Treater 9 CSA (see Attachment 7).

6. Manifests, Bills of Lading, and Biennial Report

I reviewed approximately 20 of the approximately 60 manifests generated by the facility within the last 3 years, including all manifests generated in 2012. Copies of some recent hazardous waste manifests are included as Attachment 13. Before the CEI, I reviewed the 2011 Biennial Report, which had been submitted to EPA before the deadline of March 1, 2012 (see Attachment 9). No deficiencies were noted during review of the manifests, bills of lading, or Biennial Report.

7. Personnel Training Requirements

Personnel training is required for LQGs by 40 CFR Part 262.34(a)(4) referencing 265.16. Training is required to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. I reviewed the last 3 years of documentation confirming that annual hazardous waste training had been completed (see Attachment 17). This documentation also included a record of training provided to Mr. Delany in 2011 by an off-site training firm. No training records were available for the period between 2009 and 2012. According to Messrs. Johnson and Delaney, no training was provided during this period. I concluded that the facility had failed to conduct annual training of hazardous waste personnel, as required by 40 CFR 262.34(a)(4) referencing 265.16(c) (**NOPF No. 4**). I provided compliance assistance regarding annual RCRA training.

I requested a copy of training materials documenting the topics included for training as of 2012 (see Attachment 18). The training material includes a list of the job descriptions that require RCRA training (see Attachment 18, Page 1). I verified that the training did include emergency response and implementation of the contingency plan.

During the CEI, I requested the written job descriptions for personnel responsible for management of hazardous waste and implementation of the contingency plan (see Attachment 19). These descriptions include duties, qualifications, skills, and education.

8. Preparedness and Prevention and Contingency Plan

As a LQG, Industrial Laminates is required to arrange for emergency response with local emergency agencies and to designate an emergency coordinator (EC) for the facility. Industrial Laminates has an emergency response plan that meets the definition of a RCRA contingency plan (see Attachment 20). I reviewed the contingency plan during the CEI. According to Mr. Johnson and the plan, the facility has made arrangements for emergency response with local emergency agencies, including the Postville Police Department, the Postville Fire Department, Veterans Memorial Hospital, and the Allamakee County Emergency Response Committee.

The contingency plan includes descriptions of required responses to fire, spill, explosions, and tornadoes; evacuation route and procedures; arrangements with local response agencies; and location and capabilities of emergency response equipment. The contingency plan includes the home addresses and home phone numbers for the primary (Ms. Doeppke) and alternate ECs for each shift (Mr. Shawn Thurn, Mr. Gaylon Jennings, and Mr. Rod Bries) (see Attachment 20, Page 2). The work phone number for Ms. Doeppke is provided on Page 6. According to Mr. Delaney, if needed, alternate ECs would be contacted using the x477 emergency telephone number, as they are not typically at desks. I provided compliance assistance regarding updates of the contingency plan.

9. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations contained in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Industrial Laminates is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above in contact with hazardous wastes.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Industrial Laminates is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste with an organics concentration exceeding 10 percent.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with volatile organic compounds (VOC) concentration that exceeds 500 parts per million by weight (ppmw). Wastes generated at the facility, including scrap, melamine waste, and still bottoms, have a VOC concentration that exceeds 500 ppmw at the point of generation. During the CEI at Industrial Laminates, I therefore inspected the facility for the requirements of Subpart CC. Industrial Laminates meets the Subpart CC requirements for containers by using Container Level 1 controls (containers smaller than 122 gallons that are Department of Transportation-approved). I did not find any deficiencies with regard to the facility's management of hazardous waste in containers and its compliance with the Subpart CC requirements.

10. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

(1) Failure to label a used oil storage tank as "used oil," as required by 40 CFR 279.22(c)(1) (**NOPF No. 1**).

(2) Failure to close containers of universal waste lamps, as required by 40 CFR 273.13(d)(1) (**NOPF No. 2**).

(3) Failure to conduct weekly inspections of CSAs, as required by 40 CFR 262.34(a)(1)(i) referencing 265.174 (**NOPF No. 3**).

(4) Failure to conduct annual training of hazardous waste personnel, as required by 40 CFR 262.34(a)(4) referencing 265.16(c) (**NOPF No. 4**).

(5) Failure to transport the used oil filters to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil, as required by 40 CFR 279.24(a)(3) (**NOPF No. 5**).

NOPF No. 5 was added after the inspection and communicated to the facility by email on June 6, 2012. Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Heather K. Wood
Geologist
Tetra Tech EM Inc.

Date: 6/20/12

Attachments:

1. Multimedia Screening Checklist (Two Pages)
2. RCRA Info Data Verification Handler Information Report (One Page)
3. Data Gathering Worksheets and Checklists (46 Pages)
4. Receipt For Documents And Samples (One Page)
5. Confidentiality Notice (One Page)
6. Notice of Preliminary Findings (One Page)
7. Map of the Facility (One Page)
8. Photographic Documentation (18 Pages)
9. 2011 Biennial Report and Amendment (16 Pages)
10. Hazardous Secondary Materials Checklist (Six Pages)
11. Solvent Tracking Log (Two Pages)
12. Waste Determination Information (29 Pages)
13. Hazardous Waste Manifests (32 Pages)
14. MSDS for Safety-Kleen Premium (Seven Pages)
15. Universal Waste Bill of Lading (One Page)
16. Inspection Logs (11 Page)
17. Training Logs (Four Pages)
18. Training Materials (10 Pages)
19. Job Descriptions (Three Pages)
20. Contingency Plan (11 Pages)

ATTACHMENT 1

MULTIMEDIA SCREENING CHECKLIST

(Two Pages)

Forward To: EJ ☐ EPCRA / RMP / TSCA ☑ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA / CFC ☐ RCRA ☐ UST ☑ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: INDUSTRIAL LAMINATES / NORPLEX INC.
Facility Ownership: HONEYWELL (PROPERTY OWNER)
Street: 665 LYBRAND STREET
City: POSTVILLE State: IA Zip: 52162
Phone: 563-864-4232 Facility Contact: JON THORSTENSON
Number of Employees: ~185 Work Hours/Shifts 8a - 4p, 4p - 12 MID, 12 MID - 8a M-F Facility Subject to OSHA regulations Yes ☑ No ☐

Inspector HEATHER K. WOOD
Primary Media: RCRA
Inspector Phone Ext.: 816-412-1787
Date: 5/14/12
SIC/NAICS Code 32613

Main facility activity, major process chemical(s) & description: LAMINATED SHEETS - EPOXIES, RESINS, SOLVENTS, HYDRAULIC OIL, SHEETING

(**Check all that apply**): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐, formulating ☐, distilling ☑, water treatment ☐, refrigeration ☐, manufacturing ☐, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☑), combustion (boiler, fumaces, oxidizers) ☑ plating (chrome ☐, other_____).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☑ (stop) Yes ☐
   If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ ***Forward to EJ***

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☑ No ☐ ***Forward to EPCRA*** POSTVILLE VFD
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☑ (stop) Yes ☐ ***Forward to EPCRA***
3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***
   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☑, at any time over the last 2 years? ☑
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☑, or nitrated compound, over the last calendar year? ☐
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☑ (stop) Yes ☐ ***Forward to TSCA and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ – ***Get Photo***

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☑ (stop) Yes ☑
   If yes, are all wastewater discharges permitted? Yes ☑ No ☐ ***Forward to CWA***
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☑ (stop) Yes ☐
   If yes, are the discharges permitted by: State? ☐, City? ☐ – If yes, Stop here. No ☐ ***Forward to CWA***
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ ***Forward to CWA***
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☑ (stop) Yes ☐
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ ***Forward to CWA***
4. Did you see any wastewater discharges not identified by the facility? No ☑ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (***Get Photo***) ***Forward to CWA***
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☐ (stop) Yes ☑
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☑ (stop) Yes ☐ - Identify location and timeframe_____ (***Get Photo***) ***FWD to Wetlands***

GRAY SHADED AREAS INDICATE ITEMS YOU NEED TO LOOK FOR DURING VISUAL INSPECTION

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☑ (stop) Yes ☐ ***Forward to UIC***
   If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☑ (stop) Yes ☐ ***Forward to PWS***
   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☑ Yes ☐ ***Forward to CAA***
   Source_____ ***(Get Photo)***
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☐ (stop) Yes ☑
   If yes, is equipment permitted? Yes ☑ No ☐ ***Forward to CAA*** *Describe:* #9 TREATER THERMAL OXIDATOR IDNR
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☑ (stop) Yes ☐ ***Forward to CFC***
   If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company:_____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☑ (stop) Yes ☐ ***Forward to EPCRA/RMP***
5. Does the facility service motor vehicle air conditioning systems? No ☑ (stop) Yes ☐ ***Forward to CFC***

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☑
   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ ***Forward to RCRA***
2. Is hazardous waste treated ☐ , stored >90-days ☐, burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
   No ☑ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ ***Forward to RCRA***
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☑ (stop) Yes ☐

Material Claimed To Be Non-Hazardous	**How does the facility know these wastes are non-hazardous?**
WASTE LAMINATE	Testing, industry or manuf. info.., MSDS, etc. ☑; None available ☐ ***Forward to RCRA***
EMPTY CONTAINERS	Testing, industry or manuf. info.., MSDS, etc. ☑; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☑ Yes ☐ ***Forward to RCRA***
   Describe:_____ ***(Get Photo)***
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☑ Yes ☐ ***Forward to RCRA***
   Describe:_____ ***(Get Photo)***
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☑ Yes ☐ ***Forward to RCRA & EPCRA*** Describe:_____ ***(Get Photo)***
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☐ Yes ☑ ***Forward to UST***
8. Does the facility have any underground fuel tanks for emergency generators? No ☑ Yes ☐ ***Forward to UST***

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
   No ☐ (stop) Yes ☑ - Does the facility have a certified SPCC Plan? Yes ☑ No ☐ ***Forward to SPCC***
   If yes, are there secondary containment systems for the tanks? Yes ☑ No ☐ ***Forward to SPCC***
   If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☑ Yes ☐ ***(Get Photo)*** ***Forward to SPCC***

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☑ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☑ Yes ☐

**** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS***

GRAY SHADED AREAS INDICATE ITEMS **YOU** NEED TO **LOOK** FOR DURING VISUAL INSPECTION

ATTACHMENT 2

RCRA INFO DATA VERIFICATION HANDLER INFORMATION REPORT

(One Page)

HANDLER INFORMATION REPORT

January 5, 2012

Procedures for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Beth Koesterer, AWMD/WEMM.

EPA RCRA ID Number:	IAD073489288
Name of Company/Site:	INDUSTRIAL LAMINATES/NORPLEX INC
Location of Site:	665 LYBRAND ST POSTVILLE, IA 52162 ALLAMAKEE County
Land Type:	Private
NAICS:	32613 - LAMINATED PLASTICS PLATE, SHEET (EXCEPT PACKAGING)
Mailing Address:	PO BOX 977 665 LYBRAND ST POSTVILLE, IA 52162
Site Contact:	JON B THORSTENSON
Job Title:	MANUFACTURING ENGINEER
Address:	PO BOX 977 665 LYBRAND ST POSTVILLE, IA 52162
Email:	JTHORSTENSON@NORPLEX-MICARTA.COM
Phone Number:	(563)864-4232
Current Owner of Site:	HONEYWELL
Owner Type:	Private
Current Operator of Site:	INDUSTRIAL LAMINATES/NORPLEX INC
Phone Number:	(563)864-4232
Operator Type:	Private
TYPE(S) OF REGULATED ACTIVITY:	Federal Large Quantity Generator USED OIL GENERATOR SMALL QUANTITY HANDLER OF UNIVERSAL WASTE
Hazardous Wastes Handled:	D001 D002 D007 D008 D009 D039 F003 F005 D006 U OIL

I 06/18/07 1 1st N 02/15/00 N 03/04/08 1

Certified by Notification on 03/01/10 by
JIM GILBERT 02/26/10
PLANT MANAGER

Date of Site Visit: 5/14/12

Name of Inspector (Please print): ~~HEATHER~~ K. WOOD

(Check one): ☐ EPA R7 ENSV ☑ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector: Heather K Wood

Attachment 2 Page 1 of 1

ATTACHMENT 3

DATA GATHERING WORKSHEETS AND CHECKLISTS

(46 Pages)

Appendix 1-3

Facility: INDUSTRIAL LAMINATES / NORPLEX INC. Date: 5/14/12 Arrival time: 9:05

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☑Yes ☐No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):

SEE MAP

3. Obvious concerns visible from public right-of-way (photos)? ☐Yes ☑No

- Containers	- Tanks	- Processing Equipment	- Loading Areas
- Unloading Areas	- Security Devices	- Open Drums	- Stressed Vegetation
-Unusual Staining	- Unusual Odors	- Obvious Discharges	- Improper Disposal
- Safety Concerns	- Other Concerns		

Appendix 1-4

SITE ENTRY AND INBRIEFING

1. ☑Used main entrance ☑Entered during normal operating hours ☐Excessive delays (>15 minutes - denial of access?) - ☑No

2. Facility Representative(s): TIM DELANEY Title: PRODUCT DEVELOPMENT ENG. 4Yr

ALAN JOHNSON Title: PLANT MANAGER 9 YRS

Title:

3. Does representative have intimate knowledge of all waste management practices? ☑Yes ☐No

How long in position? SEE ABOVE

4. Introduction:
- ☑Presented credentials
- ☑Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☑Verified presence at correct facility (checked address/I.D. #)
- ☑Explained authority to conduct inspection (Section 3007 of RCRA)
- ☑Explained the purpose, scope, and order of the inspection
- ☑Completed Multimedia screening checklist
- ☑Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☑Provided SBRFA
- ☐Obtained GPS reading N/A
- ☑Explained facility's right to claim CBI

5. Was full access granted? ☑Yes ☑ By facility representative or Other (name): ~~N/A~~ N/A

☐No - Access denied. Name of person denying access: N/A

Time of denial: N/A

Reason for denial, or limitations placed on access:

~~N/A~~ AREAS OF ACTIVE SOLVENT MIXING OR RECLAMATION COULD NOT BE PHOTOGRAPHED DUE TO SAFETY CONCERNS. WHERE POSSIBLE, AREAS WERE PHOTOGRAPHED FROM A SAFE DISTANCE.

Appendix 1-5 FACILITY BACKGROUND WORKSHEET

1. Site History:

Date facility began operating: 1975 Number of employees: ~185

Number of shifts/hour worked: 3 (12-8a, 8-4, 4-12 (mid)) Number of days worked per week: M-F

Size (sq. ft., how divided): ~148,000 UNDER ROOF (ALTOGETHER) — ONE MAIN BUILDING, THREE STORAGE BUILDINGS

Property owner and facility operator the same? ☐ Yes ☑ No

PROPERTY OWNED BY HONEYWELL

2. Major products or services provided: LAMINATED MATERIALS — LINEN, PAPER, GLASS MESH IMPREGNATED WITH PHENOLIC, EPOXY (RESIN A), MELAMINE

3. Major raw materials used: EPOXIES, RESINS, SOLVENTS, HYDRAULIC OIL, SHEETING

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process	Waste Stream(s)
PRODUCTION	PHENOLIC EPOXY SCRAP
	MELAMINE ~~WASH/SCRAP~~ (W) WASTE
	~~SOLVENT~~ USED SOLVENT RAGS
	ANHYDRIDE SCRAP
	~~SCRAP~~ WASTE LAMINATE (LW)
	"STILL BOTTOMS"
SOLVENT RECLAMATION	STILL BOTTOMS
QUALITY, PRODUCT TESTING	LAB WASTE
	PHENOLIC EPOXY SCRAP
GROUNDWATER REMEDIATION	WELL WATER
MAINTENANCE	USED OIL
	USED OIL FILTERS
	USED PARTS WASHER SOLVENT
	EMPTY DRUMS
	~~WAS~~ USED LAMPS
	USED BATTERIES
	GENERAL TRASH

SINGLE WASTE PROFILE

5. Complete a Generator Waste Stream Worksheet and /or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☑Yes ☐No

7. **GENERATOR STATUS:** (based on records review)

☐Non-generator
☐CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)
☐SQG (100-1000kg/mo and accumulate<6000kg)
☑LQG (>1000kg/mo)

Is facility's status solidly within above category? ☑Yes ☐No
(If not carefully verify status and document)

~43000 lb OF PHENOLIC EPOXY SCRAP IN 2011

8. **TSD STATUS:** ☐Treatment ☐Storage ☐Disposal

Note: Types of units, number of units, capacities, processes, etc:

N/A

9. Resolved questions from Pre-Inspection Worksheet? ☐Yes ☐No ☑No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet? ☐Yes ☐No ☑No Questions

11. Requested site map or diagram to identify all observations? ☑Yes ☐None Available

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

1. **WASTE STREAM:** PHENOLIC EPOXY SCRAP + ANHYDRIDE SCRAP

FACILITY DETERMINATION: ☑Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001 F003 F005

DETERMINATION METHOD: ☑Product knowledge ☑Process knowledge ☑Testing

Documentation: MSDS, ANALYSIS — TOLUENE, ACETONE SOLVENTS

GENERATING PROCESS: LAB TESTING, CLEANING OUT TREATMENT TANKS

GENERATION RATE: ~43,000 lb IN 2011

ON-SITE MANAGEMENT: Satellites ☑Visually inspected Storage ☑Visually inspected

SAA IN LAB, CSAs IN STILL ROOM, TREATER 4-6, TREATER 9, LEAN SHED, TREATER 1

OFF-SITE MANAGEMENT/DISPOSITION: COLLECTED BY ~~RINECO~~ SAVANNAH TRANSPORT → RINECO IN BENTON AR

2. **WASTE STREAM:** MELAMINE ~~WASH~~/SCRAP WASTE

FACILITY DETERMINATION: ☑Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001 F003 F005

DETERMINATION METHOD: ☑Product knowledge ☑Process knowledge ☑Testing

Documentation: MSDS — TOLUENE, ~~ACETONE~~ BUTANOL

GENERATING PROCESS: CLEANING OUT TREATMENT TANKS

GENERATION RATE: ~63,000 lb IN 2011

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☑Visually inspected

CSA IN TREATER 4-6, LEAN SHED

OFF-SITE MANAGEMENT/DISPOSITION: COLLECTED BY SAVANNAH → RINECO

3. **WASTE STREAM:** USED SOLVENT RAGS

FACILITY DETERMINATION: ☑Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001 F003 F005

DETERMINATION METHOD: ☐Product knowledge ☑Process knowledge ☑Testing

Documentation: MSDS — TOLUENE, ACETONE

GENERATING PROCESS: WIPING DOWN EQUIPMENT

GENERATION RATE: ~10,000 lb IN 2011

ON-SITE MANAGEMENT: Satellites ☑Visually inspected CSAs IN Storage ☑Visually inspected

SAA IN UPPER COMPOUNDING, STILL ROOM, TREATER 4-6, TREATER 9, LEAN SHED

OFF-SITE MANAGEMENT/DISPOSITION: COLLECTED BY SAVANNAH → RINECO

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

4 1. WASTE STREAM: ANHYDRIDE SCRAP (HW)

FACILITY DETERMINATION: ☑ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: _____

DETERMINATION METHOD: ☐ product knowledge ☑ process knowledge ☐ testing
Documentation: _____
GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
CSAs IN TREATER 1, STILL ROOM, TREATER 4-6, LEAN SHED

OFF-SITE MANAGEMENT / DISPOSITION: _____

5 2. WASTE STREAM: ~~WASTE SCRAP~~ (HW) LAMINATE

FACILITY DETERMINATION: ☐ Hazardous ☑ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: N/A

DETERMINATION METHOD: ☐ product knowledge ☑ process knowledge ☐ testing
Documentation: N/A
GENERATING PROCESS: SCRAPS OF FINISHED MATERIAL

GENERATION RATE: CONSOLIDATED WITH GENERAL TRASH

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
TRASH HOPPERS

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY RELIABLE DUMPSTER — TO WINNIESHIEK LANDFILL IN DECORAH

6 3. WASTE STREAM: STILL BOTTOMS

FACILITY DETERMINATION: ☑ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001 F003 F005

DETERMINATION METHOD: ☐ product knowledge ☑ process knowledge ☑ testing
Documentation: TOLUENE ACETONE
GENERATING PROCESS: RECLAIMING SOLVENT, STRAINING RAW MATERIAL

GENERATION RATE: ~10,000 lbs IN 2011

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
CSA IN STILL ROOM, TREATER 9, LEAN SHED

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY SAVANNAH → RINECO

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

7 1. WASTE STREAM: LAB WASTE

FACILITY DETERMINATION: ☑ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D002

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: MSDS — ETHYLENE DIBROMIDE, ACIDS
GENERATING PROCESS: QUALITY TESTING

GENERATION RATE: 2 GAL/YR

ON-SITE MANAGEMENT: satellites ☑ visually inspected storage ☐ visually inspected
FLAMMABLE MATERIALS CABINET ADJACENT TO LAB

OFF-SITE MANAGEMENT / DISPOSITION: HAVEN'T BEEN COLLECTED SINCE 9/2009 — WILL BE COLLECTED BY SAVANNAH → RINECO

8 2. WASTE STREAM: WELL WATER

FACILITY DETERMINATION: ☑ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001 D007 D008 F003 F005

DETERMINATION METHOD: ☑ product knowledge ☐ process knowledge ☑ testing
Documentation: ANALYSIS DURING INVESTIGATION
GENERATING PROCESS: REMEDIATION OF GW PLUME FROM PREVIOUS OWNER

GENERATION RATE: ~~45 000~~ (HW) ~49 000 (HW) IN 2011

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
WELL WATER CSA

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY VEOLIA — TO ITS FACILITIES IN PORT ARTHUR TX OR ~~ST. CLAIR IL~~ (HW) SAUGET IL

9 3. WASTE STREAM: USED OIL ("OILY WATER")

FACILITY DETERMINATION: ☐ Hazardous ☑ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: N/A

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: N/A
GENERATING PROCESS: MAINTAINING HYDRAULIC EQUIP.

GENERATION RATE: ~9 000 GAL/YR

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
2 ASTS IN MAINTENANCE

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY SAFETY-KLEEN — TAKEN TO DAVENPORT FACILITY

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

10 1. **WASTE STREAM:** USED OIL FILTERS

FACILITY DETERMINATION: ☐ Hazardous ☑ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: N/A

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: N/A
GENERATING PROCESS: MAINTENANCE OF HYDRAULIC EQUIPMENT

GENERATION RATE: ~15/YR

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
DRAINING DURING INSPECTION

OFF-SITE MANAGEMENT / DISPOSITION: TAKEN TO ~~MONONA~~ CLAYTON CO. RECYCLING IN MONONA IA

11 2. **WASTE STREAM:** USED PARTS WASHER SOLVENT

FACILITY DETERMINATION: ☑ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D039

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: MSDS — PREMIUM SOLVENT
GENERATING PROCESS: PARTS WASHER

GENERATION RATE: 55 GALLONS IN 2011

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
(1) ~~DRUM~~ SAA IN MAINTENANCE

OFF-SITE MANAGEMENT / DISPOSITION: S-K — TO DAVENPORT FACILITY

12 3. **WASTE STREAM:** EMPTY DRUMS

FACILITY DETERMINATION: ☐ Hazardous ☑ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: N/A

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: RCRA EMPTY
GENERATING PROCESS: EMPTY RAW MATERIALS CONTAINERS

GENERATION RATE: (1) ~~DRUM~~ 4000 ft³ / 4 MO.

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
TRUCK TRAILER

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY CONSOLIDATED CONTAINER OF M'PLS MN

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

13 1. **WASTE STREAM:** USED LAMPS

FACILITY DETERMINATION: ☑ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: ~~D008~~ D009

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: PRODUCT LABELS
GENERATING PROCESS: MAINTENANCE

GENERATION RATE: ~~250/YR~~ ~500/YR

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
CONTAINERS IN BOILER ROOM AND POLE BARN #1

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY RETROFIT RECYCLING OF OWATONNA MN

14 2. **WASTE STREAM:** USED BATTERIES

FACILITY DETERMINATION: ☑ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D006 D008

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: PRODUCT LABELING
GENERATING PROCESS: MAINTENANCE

GENERATION RATE: 30 GAL/YR

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
BATTERY CONTAINERS IN SERVER ROOM AND MAINTENANCE OFFICE

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY RETROFIT RECYCLING

15 3. **WASTE STREAM:** GENERAL TRASH

FACILITY DETERMINATION: ☐ Hazardous ☑ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: N/A

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing
Documentation: N/A
GENERATING PROCESS: FACILITY MAINT.

GENERATION RATE: 10 TONS/YR

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected
ROLLAWAY CONTAINERS

OFF-SITE MANAGEMENT / DISPOSITION: TAKEN TO WINNESHIEK LANDFILL IN DECORAH

Appendix 1-8 RECORDS REVIEW WORKSHEET AND CHECKLIST

A. MANIFESTS

#	√/ x	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.	✓	Facility uses manifest system-262.20(a)(1)	HARD COPIES FOR 2012 — OLDER ARE ELECTRONIC ~1 RINSCO MANIFEST/MO ~4 WELL WATER MANIFESTS/YR ~4 SK MANIFESTS/YR FOR PARTS WASHER
2.	✓	Manifests maintained for 3 years-262.40(a)	
3.	✓	Generator EPA I.D. number-262.20(a)	
4.	✓	Generator name, address, phone number-262.20(a)	
5.	✓	Transporter(s) name & EPA I.D. number-262.20(a)	
6.	✓	Designate facility name, address & EPA I.D. number-262.20(a)	
7.	N/A	Alternate facility designated (optional)-262.20(c)	
8.	✓	Unique pre-printed manifest tracking number and number of pages-262.20(a)	
9.	✓	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
10.	✓	Containers: numbers, type, quantity, unit wt/vol.-262.20(a)	
11.	✓	Proper certification including waste minimization-262.20(a)	
12.	✓	Signed and dated-262.23(a)	
13.	N/A	Exception report submitted if necessary-262.42	
14.		Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	
15.		Generator maintains copy of contractual agreement for at least 3 years after termination or expiration of the agreement (SQG only)-262.20(e)(2)	
16.	✓	LDR notification/certification sent with manifests on 1st shipment-268.7(a)(2)	
17.	✓	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7(a)(2)	
18.	✓	LDR notification/certification/waste analysis data & other documents maintained for 3 years-268.7(a)(8)	
19.	✓	Biennial Reports submitted per 262.41 (LQG only)	

√ - in compliance X – not in compliance N/A – not applicable

20. Approximate number of manifests generated since last inspection, or over past 3 years: ~60

21. Approximate number of manifests reviewed: ~10 ALL FOR 2012 — SPOT-CHECK OLDER

22. Copies of manifests made with regulatory violations? ☐ YES ☑ NO
COPIES FOR DOCUMENTATION

23. Additional requirements for *off-site* generated manifests:

#	√ / x	ADDITIONAL I.S./PERMIT* REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
a.	N/A	Manifests signed and dated-265.71(a)(2)(i)	
b.		Manifest discrepancies noted and corrected w/in 15 days-265.71(a)(2)(ii)	
c.		Copy immediately given to transporter-265.71(a)(2)(iii)	
d.		Copy sent to generator w/in 30 days-265.71(a)(2)(iv)	
e.		Manifests retained for 3 years-265.71(a)(2)(v)	
f.		LDR notification/certifications retained for 3 years-268.7(e)(2)	
g.	✓	Biennial Reports submitted per 265.75	

√ - in compliance X – not in compliance N/A – not applicable * - please not applicable permit requirement

h. Approximate number of manifests generated since last inspection, or over past 3 years: N/A

i. Approximate number of manifests reviewed: N/A

j. Copies of manifests made with regulatory violations? ☐ YES ☐ NO N/A

B. PREPAREDNESS AND PREVENTION

#	√ / x	REGULATORY REQUIREMENTS	COMMENTS
1.	✓	Arrangements with local emergency agencies made-262.34(d)(4)→265.37 [SQG] or 262.34(a)(4)→265.37 [LQG, I.S.]	
2.	✓	Emergency coordinator on premises or on call-262.34(d)(5)(i) [SQG] or 262.34(a)(4)→265.55 [LQG, I.S.]	
3.	N/A	Emergency coordinator's name and phone number, fire department's phone number, and the location of fire extinguishers and spill control equipment posted near the phone [SQG only]-262.34(d)(5)(ii)	

√ - in compliance X – not in compliance N/A – not applicable

C. CONTINGENCY PLAN

(SQG – N/A, LQG's – 262.34(a)(4) referencing 265 Subpart D, I.S.-265 only)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Has contingency plan→265.51(a)	
2.	✓	Contingency plan maintained on-site→265.53(a)	
3.	✓	Plan submitted to emergency response agencies→265.53(b)	
4.	✓	Description of actions needed to respond to fires, explosions, or releases of hazardous wastes→265.52(a)	
5.	✓	Description of arrangements with local emergency agencies, as appropriate→265.52(c)	
6.	✓	List names, addresses & phone numbers (both home and office) of emergency coordinators & designated primary EC→265.52(d)	HOME ON PG 2 WORK ON PG 6
7.	✓	List & describe emergency equipment its location, and its capabilities, as required→265.52(e)	
8.	✓	Include complete evacuation plan (signal, alternate route), if required→265.52(f)	
9.	✓	Emergency coordinator must be thoroughly familiar with all aspects of facility→265.55	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

D. PERSONNEL TRAINING

(SQG – 262.34(d)(5)(iii), LQG's – 262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Program director trained in hazardous waste management procedures (LQG only)→265.16(a)(2)	
2.	✓	Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)→265.16(b)	
3.	X	Employees are trained annually (LQG only)→265.16(c)	
4.	✓	Job title & name of person filling position specified (LQG only)→265.16(d)(1)	
5.	✓	Written job description including: skills, education or qualification, and duties (LQG only)→265.16(d)(2)	
6.	✓	Written description of type and amount of introductory & continuing training provided (LQG only)→265.16(d)(3)	
7.	✓	Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)→265.16(a)(3)	
8.	✓	Documentation confirming training has been completed (LQG only)→265.16(d)(4)	
9.	✓	Records maintained on-site for current employees & for 3 years for former employees→265.16(d) & (e) respectively	GAP → NO TRNG BETWEEN 2009 & 2012, SO NO RECORDS
10.	N/A	All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)→262.34(d)(5)(iii)	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

11. Notes/Observations: NO RCRA TRAINING BETWEEN 2009 AND 2012

LYON TECHNOLOGIES – BALTIMORE & BOSTON – WILL DO ONCE A YEAR

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: OFFICE

2. Person responsible for waste analysis/waste determination: TOM DELANEY

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal-262.11(d)→268.7(a)(1)	
5.	✓	Determines waste does not meet applicable treatment standards (ATS)-268.7(a)(2)	
a.	✓	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(2)	
b.	N/A	SQG disposes of waste under a contractual or tolling agreement-268.7(a)(10). (LDR Notice available for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement)	
6.	↓	Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-268.5 & 6. (Describe the variance, extension, or petition that applies)	
a.	↓	Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-268.7(a)(4).	
7.	✓	Ships waste(s) covered by the LDRs off-site for treatment or disposal-268.7(a)(2). If no, go to 8.	
a.	✓	Provides a notice with initial shipment, or new notification, if changes occur-268.7(a)(2)	
b.	✓	Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-268.7(a)(2)→268.7(a)(4)	
8.	N/A	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation-268.7(a)(7)	
a.	↓	Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files-268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice-268.7(a)(2)(i))	
9.	↓	Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment-268.7(a)(3)	
a.	↓	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(3)(i)	
10.	↓	Additional special rules regarding waste that exhibits a characteristic-268.9	

a.	N/A	If not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)-268.9(a)
b.	↓	If land disposed, waste meets the treatment standards specified in 268 Subpart D-268.9(c)
c.	↓	First claims that their characteristic waste is no longer hazardous-sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation or receiving facility-268.9(d)
11.	✓	Impermissible dilution of waste to meet LDR standards in not occurring-268.3(a) & (b)
12.	N/A	If hazardous waste prohibited from land disposal is either: a contaminated soil, or is a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge – See additional LDR checklists in Appendix 2-1
13.	↓	References to Waste Specific Prohibitions under Subpart C: - Wood Preserving Wastes – 268.30 - Dioxin-containing Wastes – 268.31 - TC Metal Wastes – 268.34 - Petroleum Refining Wastes – 268.35 - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated – 268.37 - Newly Identified Organic Toxicity Characteristic Wastes and Newly Listed Coke By-Product and Chlorotoluene Production Wastes – 268.38 - Spent Aluminum Pot Liners; Reactive; and Carbamate Wastes – 268.39
14.	↓	Prohibition on Storage of Restricted Waste-268.50
15.	✓	Reminder – Treatment Standards listed in 268.41 through 268.49

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

16. Notes/Observations: N/A

J. USED OIL – RCRA INSPECTION CHECKLIST

1. What Used Oil activities does the facility engage in? MAINTENANCE OF PRESS EQUIPMENT

a. Type of used oil generated? HYDRAULIC
b. Amount of used oil generated? ~9000 GAL/YR

40 CFR 279.12 Prohibition Questions

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265? ☐ Yes ☑ No ☐ Not Applicable (NA)

2. Is used oil being used as a dust suppressant? ☐ Yes ☑ No

3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part 279.12 (c)(1-3)? ☐ Yes ☐ No NA

Subpart C – Standards for Used Oil Generators

(Check here ☐ if this section is NA)

✎ *Instructions:* *Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.*

Regulation and Standard		*Violations*
279.21 Hazardous Waste Mixing		
1. Is the generator mixing hazardous waste with used oil?	☐ Yes ☑ No ☐ NA	
If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted?	☐ Yes ☐ No ☑ NA	
2. Are analytical data available?	☐ Yes ☐ No ☑ NA	
279.22 Used Oil Storage		
1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265?	☑ Yes ☐ No ☐ NA	
2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks?	☑ Yes ☐ No ☐ NA	
3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"?	☐ Yes ☒ No ☐ NA	
4. Upon detection of a release of used oil, has the generator		
a. Stopped the release?	☐ Yes ☐ No ☑ NA	
b. Contained the release?	☐ Yes ☐ No ☑ NA	
c. Cleaned up and managed the used oil and other materials?	☐ Yes ☐ No ☑ NA	
d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	☐ Yes ☐ No ☑ NA	
279.23 Used Oil Storage		
1. Is the generator burning used oil in used oil fired space heaters only when		
a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators?	☐ Yes ☐ No ☑ NA	
b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour?	☐ Yes ☐ No ☑ NA	
c. The combustion gasses from the heater are vented to ambient air?	☐ Yes ☐ No ☑ NA	

Regulation and Standard		*Violations*
279.24 Off-Site Shipment		
1. Has the generator ensured that the used oil is hauled only by a transporter that has obtained a U.S. Environmental Protection Agency (EPA) identification (ID) number?	☑ Yes ☐ No ☐ NA	
2. Does the generator have a tolling arrangement with a transporter without an EPA ID number?	☐ Yes ☐ No ☑ NA	
If yes, answer the three following questions. If no, move to question 6.		
3. Is the used oil reclaimed and returned by the processor or re-refiner to the generator for use as a lubricant, cutting oil, or coolant?	☐ Yes ☐ No ☑ NA	
4. Does the tolling contract indicate the type of used oil and the frequency of shipment?	☐ Yes ☐ No ☑ NA	
5. Is the vehicle used to transport the used oil to the processing or re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor or re-refiner?	☐ Yes ☐ No ☑ NA	
6. Does the generator transport used oil generated at the generator's site or used oil collected from household do-it-yourselfers to a used oil collection center or to aggregation points owned by the generator?	☐ Yes ☐ No ☑ NA	

Regulation and Standard		*Violations*
7. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?	☑ Yes ☐ No ☐ NA (46)	USED OIL FILTERS ONLY
8. Does the generator transport no more than 55 gallons of used oil at any time?	☑ Yes ☐ No ☐ NA (46)	
9. Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil?	☑ (47) Yes ☒ No ☐ NA (46)	

For further Used Oil questions refer to Appendix 2-4:

Subpart D – Standards for Used Oil Collection Centers and Aggregation Points
Subpart E – Standards for Used Oil Transporters and Transfer Centers
Subpart F – Standards for Used Oil Processors and Re-Refiners
Subpart G – Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery
Subpart H – Standards for Used Oil Fuel Marketers

K. Universal Waste (UW)

1. Universal Waste Generated

Waste:	Fluorescent & HID Lamps	Batteries	Hg-containing equip. and/or thermostats	Pesticides
Qty. Generate/year:	500/YR	30 GAL		
Qty. Presently in storage:	~100	10 GAL		
Accumulation Time:	9 MO	11 MO		
Present Disposal Method:	RECYCLING	RECYCLING		

2. Person(s) responsible for universal waste management: TOM DELANEY

3. Does the universal waste handler accumulate (collectively) 5,000 kilograms or more at any time (40 CFR 273.9)? **If YES**, a large quantity handler (LQH), go on and also refer to checklist in Appendix 2-2. **If NO**, a small quantity handler (SQH), go on.

Assessing Requirements Common to *Universal Waste SQH & LQH* (40 CFR 273 Subpart B & C, respectively):

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Disposal of UW is not occurring-273.11(a)/273.31(a)	
2.	✓	Diluting or treating universal waste is not occurring, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)-273.11(b)/273.31(b)	
3.	N/A	Has the LQG notified of UW management?-273.32 (a)(1) (not required for SQH)	
4.	↓	Has UW been shipped to another UW handler, a designated facility, or a foreign destination?-273.18(a)/273.38(a) If not, see Appendix 2-2 for off-site shipments	
a.	↓	Does LQH have documentation tracking shipments?-273.39 (not required for SQH-273.19)	
5.	✓	UW package, container, tank, vessel or transport vehicle is marked or labeled-273.14/273.34-as follows:	
a.	✓	"Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"-273.14(a)/273.34(a)	
b.	N/A	For recalled universal waste pesticides; "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)," and the label that was on or accompanied the product as sold or distributed, or if the label is not available or not feasible to use, the appropriate DOT label as identified in 49 CFR 172-273.14(b)/273.34(b)	
c.	↓	For unused pesticide products as described in 40 CFR 273.3(a)(2): (1) the label that was on the product when purchased, if still legible; (2) if using that label is not feasible, the appropriate label required under DOT regulation 49 CFR Part 172; (3) if using either of the previously described labels is not feasible, another label prescribed or designated by the waste pesticide collection program administered or recognized by a state; **and** (4) the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"-273.14(c)/273.34(c)	
d.	↓	"Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"-273.14(d)(1)/273.34(d)(1) Thermostats may be labeled: "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"-273.14(d)(2)/273.34(d)(2)	
e.	✓	"Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"-273.14(e)/273.34(e)	

6.	✓	Accumulation Time Limits – 273.15/273.35 A UW handler may accumulate universal waste **no longer than a year** from the date of generation or receipt from another handler, unless the requirements of paragraph 273.15(b) are met, as follows:	
a.	N/A	Storage over one year is solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal and the handler provides proof of this – 273.15(b)/273.35(b) For further requirements of UW retention time documentation, see Appendix 2-2.	
7.	✓	Employee Training – 273.16/273.36 The UW handler must inform all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.	
8.	N	Response to Releases – 273.17/273.37 – Did you observe any releases or did any releases occur? – if yes, see Appendix 2-2.	
9.	N/A	Handlers of universal waste that self-transport universal waste off-site become a universal waste transporter for those self-transportation activities and must comply with the transporter requirements of subpart D of this part while transporting the universal waste – 273.18(b)/273.38(b) – and see Appendix 2-2.	

L. RCRA AIR EMISSIONS

1. **Is facility a LQG✓ Interim Status TSD__ or Permitted TSD__ If NOT, do not continue with the RCRA Air Emissions checklists.**

2. Location of records: OFFICE

3. Person responsible for records: TOM DELANEY

Assessing RCRA Air Emission Requirements (Subparts AA, DD and CC) commonly applicable:

#	√/ x	REGULATORY REQUIREMENT*	MANIFEST #'S AND COMMENTS
1.	N/A	**Subpart AA** – 264/5.1030 Does the facility have any hazardous waste management unit using the following processes: distillation, fractionation, thin-film evaporation, solvent extraction, air stripping and steam stripping? **If NO, then proceed to the Subpart BB checklist.** If YES, refer to specific Subpart AA questions in Appendix 2-3	
2.	N/A	**Subpart BB** regulated equipment – 264/5.1050 Does the facility have any valves, flanges, or pumps that contain or contact hazardous wastes with >10% organics?	
a.	N/A	Does the facility have any compressors, pressure relief devices, sampling connection systems, flanged pipe, open-ended valve, or line that contain or contact hazardous wastes with >10% organics?	
b.		Is the facility claiming the <300 hours exemption?	
3.		If any of the answers to questions 2(a), (b), or (c) above is Yes, does the facility have a list of each piece of equipment that is subject to Subpart BB? (facility should have a list in their operating record, ask for copy)-264/5/1064(g)	
a.		If any of the answers to questions 2(a) or 2(b) is No, does the facility have information or documentation to support its determination (obtain a copy of this documentation for EPA).	
4.		Has this equipment been marked as required by the Subpart BB regulations?-264.1050(d)/265.1050(c)	
5.		Has the facility implemented a LDAR program?-264/5.1064	
6.		See Appendix 2-3 for more specific Subpart BB questions.	
7.	Y	**Subpart CC** – 264/5.1080 Are there any units at the facility subject to the CC Rule?	
a.	N/A	If the answer to 7(a) is No, what is the reason? Refer to 40 CFR 265.1080(b) (264.1080(b)) exceptions or 265.1083(c) (264.1082(c)) exemptions, or the general exclusions in 265.1(g) (264.1(g)).	
b.		If the answer is Yes, refer to Appendix 2-3 for more specific Subpart CC questions.	

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☑<90 day ☐<180 day ☐<270 day ☐I.S. ☐Permit TREATER 1
2. I.S./Permitted capacity: N/A

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)	
5.	✓	Containers in good condition-262.34(a)(1)(i)→265.171	
6.	✓	Containers are compatible with waste-262.34(a)(1)(i)→265.172	
7.	✓	Containers kept closed-262.34(a)(1)(i)→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34(a)(1)(i)→265.173(b)	
9.	✓	Containers storing incompatibles separated or protected from each other-262.34(a)(1)(i)→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQGs, I.S. & Permit, only]-262.34(a)(1)(i)→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-262.34(a)(4)→265.35	
12.	✓	Container stored for less than 90/180/270 days, as applicable-262.34	
13.	X	Storage area inspected weekly-262.34(a)(1)(i)→265.174	GAPS — 8/19/11 to 9/7/11 AMONG OTHERS ~~4/10/12 to 5/[illegible]/12~~
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections of loading/unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	↓	Placards available for use by transporters when applicable-262.33	

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-262.34(a)(4)→265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent etc.) -262.34(a)(4)→265.32(c)	
24.	✓	Adequate water supply for fire control equipment-262.34(a)(4)→265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-262.34(a)(4)→265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-262.34(a)(4)→265.31	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

27. Container inventory: ☑ Actual Count ☐ Approximate count

Waste Type	Container Size	Total	
ANHYDRIDE SCRAP	1 x55 gal. ___ x 30 gal. ___	55	5/12/12
	___x55 gal. ___x 30 gal. ___		
	___x55 gal. ___x 30 gal. ___		
	___x55 gal. ___x 30 gal. ___		
	___x55 gal. ___x 30 gal. ___		
	___x55 gal. ___x 30 gal. ___		
	___x55 gal. ___x 30 gal. ___		

Total Quantity (pounds, gallons, etc.): 55

28. How were container volumes verified? WEIGHT

29. Photos taken to verify observations: ☑ YES ☐ NO Numbers: 4, 32

30. Container management area location noted on map or diagram: ☑ YES ☐ NO

31. Notes/Observations: ALSO ONE CONTAINER OF "IN PROCESS EPOXY WASH"

Appendix 1-9 **VISUAL REVIEW WORKSHEET AND CHECKLIST**

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit STILL RCRA

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.	✓	Containers in good condition-262.34→265.171	
6.	✓	Containers are compatible with waste-262.34→265.172	
7.	✓	Containers kept closed-262.34→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34→265.173(b)	
9.	✓	Containers storing incompatible separated or protected from each other-262.34→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	X	Storage area inspected weekly-265.174	
ADDITIONAL I.S. REQUIREMENTS*			
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
PRE-TRANSPORT REQUIREMENTS*			
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☑ Actual count ☐ Approximate count

Waste Type	Container Size	Total	
PHENOLIC EPOXY SCRAP	11 x 55 gal. ___ x 30 gal. ___	~~110~~ 605	5/8/12 OLDEST
USED SOLVENT RAGS	2 x 55 gal. ___ x 30 gal. ___	~~55~~ 110	4/18/12 OLDEST
STILL BOTTOMS	1 x 55 gal. ___ x 30 gal. ___	55	5/4/12
ANHYDRIDE SCRAP	1 x 55 gal. ___ x 30 gal. ___	55	4/26/12
	___ x 55 gal. ___ x 30 gal. ___		
	___ x 55 gal. ___ x 30 gal. ___		
	___ x 55 gal. ___ x 30 gal. ___		

Total Quantity (pounds, gallons, etc.): 825 GAL

28. How were container volumes verified? WEIGHT, STATEMENT

29. Photos taken to verify observations: ☑ YES ☐ NO Numbers: 3, 8, 9, 31

30. Container management area location noted on map or diagram: ☑ YES ☐ NO

31. Notes Observations: ALSO 4 55-GAL CONTAINERS OF "IN PROCESS MATERIAL"

Appendix 1-9 **VISUAL REVIEW WORKSHEET AND CHECKLIST**

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

TREATER 4-6

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.	✓	Containers in good condition-262.34→265.171	
6.	✓	Containers are compatible with waste-262.34→265.172	
7.	✓	Containers kept closed-262.34→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34→265.173(b)	
9.	✓	Containers storing incompatible separated or protected from each other-262.34→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	X	Storage area inspected weekly-265.174	
ADDITIONAL I.S. REQUIREMENTS*			
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
PRE-TRANSPORT REQUIREMENTS*			
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.		Placards available for use by transporters when applicable-262.33	

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☑ Actual count ☐ Approximate count

Waste Type	Container Size	Total	
USED SOLVENT RAGS	1 x 55 gal. ___ x 30 gal. ___	55	5/9/12
PHENOLIC EPOXY SCRAP	1 x 55 gal. ___ x 30 gal. ___	55	5/14/12
ANHYDRIDE SCRAP	1 x 55 gal. ___ x 30 gal. ___	55	5/9/12
MELAMINE ~~SCRAP~~ WASTE (ink)	1 x 55 gal. ___ x 30 gal. ___	55	5/12/12
	___ x 55 gal. ___ x 30 gal. ___		
	___ x 55 gal. ___ x 30 gal. ___		
	___ x 55 gal. ___ x 30 gal. ___		

Total Quantity (pounds, gallons, etc.): 220 GALL

28. How were container volumes verified? STATEMENT

29. Photos taken to verify observations: ☑ YES ☐ NO Numbers: 6

30. Container management area location noted on map or diagram: ☑ YES ☐ NO

31. Notes Observations: 2 DRUMS "IN-PROCESS MATERIAL"

Appendix 1-9 **VISUAL REVIEW WORKSHEET AND CHECKLIST**

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit WELL WATER CSA

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.	✓	Containers in good condition-262.34→265.171	
6.	✓	Containers are compatible with waste-262.34→265.172	
7.	✓	Containers kept closed-262.34→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34→265.173(b)	
9.	✓	Containers storing incompatible separated or protected from each other-262.34→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	X	Storage area inspected weekly-265.174	
ADDITIONAL I.S. REQUIREMENTS*			
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
PRE-TRANSPORT REQUIREMENTS*			
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.		Placards available for use by transporters when applicable-262.33	

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☑ Actual count ☐ Approximate count

Waste Type	Container Size	Total	
WELL WATER	___ x 55 gal. 1 x ~~30 gal.~~ 300 GAL	25	4/23/12 (LARGE GRAPH)
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		

Total Quantity (pounds, gallons, etc.): 25 GAL

28. How were container volumes verified? VISIBLE

29. Photos taken to verify observations: ☑ YES ☐ NO Numbers: 28

30. Container management area location noted on map or diagram: ☑ YES ☐ NO

31. Notes Observations: PUMPING HALTED DURING INVESTIGATION

Appendix 1-9 **VISUAL REVIEW WORKSHEET AND CHECKLIST**

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit TREATER 8

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	N/A	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.	✓	Containers in good condition-262.34→265.171	
6.	✓	Containers are compatible with waste-262.34→265.172	
7.	✓	Containers kept closed-262.34→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34→265.173(b)	
9.	✓	Containers storing incompatible separated or protected from each other-262.34→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.		Placards available for use by transporters when applicable-262.33	

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☑ Actual count ☐ Approximate count

Waste Type	Container Size		Total	
NONE	____ x 55 gal.	____ x 30 gal.	_____	_____
_____	____ x 55 gal.	____ x 30 gal.	_____	_____
_____	____ x 55 gal.	____ x 30 gal.	_____	_____
_____	____ x 55 gal.	____ x 30 gal.	_____	_____
_____	____ x 55 gal.	____ x 30 gal.	_____	_____
_____	____ x 55 gal.	____ x 30 gal.	_____	_____
_____	____ x 55 gal.	____ x 30 gal.	_____	_____

Total Quantity (pounds, gallons, etc.):_____

28. How were container volumes verified? N/A

29. Photos taken to verify observations: ☐ YES ☑ NO Numbers:_____

30. Container management area location noted on map or diagram: ☑ YES ☐ NO

31. Notes Observations: ONE CONTAINER OF IN-PROCESS MATERIAL

Appendix 1-9 **VISUAL REVIEW WORKSHEET AND CHECKLIST**

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

TREATER 9

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.	✓	Containers in good condition-262.34→265.171	
6.	✓	Containers are compatible with waste-262.34→265.172	
7.	✓	Containers kept closed-262.34→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34→265.173(b)	
9.	✓	Containers storing incompatible separated or protected from each other-262.34→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	X	Storage area inspected weekly-265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.		Placards available for use by transporters when applicable-262.33	

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☑ Actual count ☐ Approximate count

Waste Type	Container Size	Total	
STILL BOTTOMS	1 x 55 gal. ___ x 30 gal.	55	5/2/12
USED SOLVENT RAGS	1 x 55 gal. ___ x 30 gal.	55	5/2/12
PHENOLIC EPOXY SCRAP	1 x 55 gal. ___ x 30 gal.	55	4/12/12
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		

Total Quantity (pounds, gallons, etc.): 165 GALL

28. How were container volumes verified? WEIGHT, STATEMENT

29. Photos taken to verify observations: ☐ YES ☑ NO Numbers: _____

30. Container management area location noted on map or diagram: ☑ YES ☐ NO

31. Notes Observations: ONE CONTAINER IN-PROCESS MATERIAL

Appendix 1-9 **VISUAL REVIEW WORKSHEET AND CHECKLIST**

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit LEAN SITED

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"- 262.34(a)(3)	
5.	✓	Containers in good condition-262.34→265.171	
6.	✓	Containers are compatible with waste-262.34→265.172	
7.	✓	Containers kept closed-262.34→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34→265.173(b)	
9.	✓	Containers storing incompatible separated or protected from each other-262.34→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	X	Storage area inspected weekly-265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.		Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☑ Actual count ☐ Approximate count

Waste Type	Container Size	Total	
MELAMINE WASTE SCRAP (MW)	12 x 55 gal. ___ x 30 gal.	660	OLDEST 4/19/12
PHENOLIC EPOXY SCRAP	7 x 55 gal. ___ x 30 gal.	385	OLDEST 4/27/12
STILL BOTTOMS	3 x 55 gal. ___ x 30 gal.	165	OLDEST 3/30/12
USED SOLVENT RAGS	6 x 55 gal. ___ x 30 gal.	330	OLDEST 3/14/12
HAZ WASTE RESIN SOLN.	60 x 55 gal. ___ x 30 gal.	3300	OLDEST 3/29/12
	___ x 55 gal. ___ x 30 gal.		
	___ x 55 gal. ___ x 30 gal.		

Total Quantity (pounds, gallons, etc.): 4840 GAL

28. How were container volumes verified? STATEMENT

29. Photos taken to verify observations: ☑ YES ☐ NO Numbers: 10, 29, 30

30. Container management area location noted on map or diagram: ☑ YES ☐ NO

31. Notes Observations: HAZARDOUS WASTE RESIN SOLUTION IS SHIPPING NAME FOR PHENOLIC EPOXY SCRAP AND ANHYDRIDE SCRAP

B. SATELLITE ACCUMULATION AREA(S)

1. Total number of satellite areas inspected at facility: 4

#	REGULATORY REQUIREMENTS	SA1: MAINT	SA2: UPPER COMPOUND	SA3: LAB WASTE	SA4: PRODUCT TESTING
2.	Area at or near the point of generation-262.34(c)(1)	✓	✓	✓	✓
3.	Area under the direct control of operator-262.34(c)(1)	✓	✓	✓	✓
4.	Quantities accumulated do not exceed 55 gallons or 1 quart (acute)-262.34(c)(1)	✓	✓	✓	✓
5.	Excess accumulation removed within 3 days-262.34(c)(2)	✓	✓	✓	✓
6.	Containers marked identifying their contents-262.34(c)(1)(ii)	✓	✓	✓	✓
7.	Containers in good condition-262.34(c)(1)(i)→265.171	✓	✓	✓	✓
8.	Containers are compatible with waste-262.34(c)(1)(i)→265.172	✓	✓	✓	✓
9.	Containers kept closed-262.34(c)(1)(i)→265.173(a)	✓	✓	✓	✓

√ - in compliance X – not in compliance N/A – not applicable

Above Satellite Areas with problems:

SA1: Name/Location of area: MAINTENANCE SHOP

Person responsible for area: MAINT. STAFF

Type(s) and Volumes of waste accumulated: USED PARTS WASHER SOLN ~~~30 GAL~~ (W) ~15 GALL

Number and Type of containers: 1 ~~55 GALL~~ (W) 30-GALL CONTAINER

SA2: Name/Location of area: UPPER COMPOUNDING

Person responsible for area: COMPOUNDER

Type(s) and Volumes of waste accumulated: USED SOLVENT RAGS ~5 GALL

Number and Type of containers: 1 7.5-GALL CONTAINER

SA3: Name/Location of area: LAB WASTE

Person responsible for area: LAB TECH

Type(s) and Volumes of waste accumulated: LAB WASTE — 6 GALL

Number and Type of containers: ~~6~~ (W) 9 2-GALL CONTAINERS

SA4: Name/Location of area: PRODUCT TESTING

Person responsible for area: LAB TECH

Type(s) and Volumes of waste accumulated: PHENOLIC EPOXY SCRAP ~6 GALL

Number and Type of containers: 3 5-GALL CONTAINERS

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☑ Yes ☐ No
   - Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
   - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
   - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.

☑ Identified/verified violations from previous inspection were corrected (if applicable)
☑ Addressed all unresolved inspection related issues
☑ Summarized findings and observations for the facility representatives

NOPF
~~NOV~~ issued? ☑ Yes ☐ No ☑ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

☑ Explained the importance of a timely (14 day) and adequate response
☑ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
☑ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
☑ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
☐ Provided facility with CBI form
☑ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☑ No

4. Facility appears to have awareness of RCRA regulations? ☑ Yes ☐ No

5. Facility has its own environmental staff? ☑ Yes ☐ No

6. Facility has copy of applicable regulations? ☑ Yes ☐ No

7. Attitude and demeanor of facility representative(s); ☑ OK ☐ Not OK

8. Notes/Observations:

N/A

Appendix 2-2 Universal Waste (Additional Checklists)

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	N/A	Notification (**Not Required for small quantity handlers, go to 3)**- 273.32 Large quantity handler must have sent written notification of universal waste management to the Regional Administrator, and received an EPA Identification Number, before meeting or exceeding the 5,000 kilogram storage limit, unless the following conditions are met: (1) large quantity handler has already notified of hazardous waste management activities and received and EPA Identification Number, (2) large quantity handler of universal waste who manages recalled universal waste pesticides as described in 40 CFR 273.3(a)(l) and who has sent notification to EPA as required by 40 CFR 165.	
a.	↓	This notification must include - 273.32 (b): (1) universal waste handler's name and mailing address; (2) name and business telephone number of the person at the universal waste handler's site who should be contacted regarding universal waste management activities; (3) the address or physical location of the universal waste management activities; (4) a list of all types of universal waste managed by the handler; (5) a statement indicating that the handler is accumulating more than 5000 kg of universal waste at one time and the types of universal waste the handler is accumulating above the quantity.	
2.	✓	Universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions is contained. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage-273.13(a)(l)/273.33(a)(l) **If not generated, go to 5.**	
3.	N/A	Waste Management of Universal Batteries as follows, provided the casing of each individual battery cell is not breached or remains intact and closed (except to remove electrolyte)-273.13(a)(2)/273.33(a)(2)	
a.	↓	Sorting batteries by type-273.13(a)(2)(i)/273.33(a)(2)(i)	
b.	✓	Mixing battery types in one container-273.13(a)(2)(ii)/273.33(a)(2)(ii)	
c.	N/A	Discharging batteries so as to remove the electric charge-273.13(a)(2)(iii)/273.33(a)(2)(iii)	
d.	↓	Regenerating used batteries-273.13(a)(2)(iv)/273.33(a)(2)(iv)	
e.	↓	Disassembling batteries or battery packs into individual batteries or cells- 273.13(a)(2)(v)/273.33(a)(2)(v)	
f.	↓	Removing batteries from consumer products-273.13(a)(2)(vi)/273.33 (a)(2)(vi)	

g.	N/A	Removing electrolyte from batteries- 273.13(a)(2)(vii)/273.33(a)(2)(vii)	
4.		Handler determines whether any waste(s) generated as a result of the activities listed in 3 above, exhibit a characteristic of hazardous waste- 273.13(a)(3)/273.33(a)(3) (If waste is regulated as hazardous waste, complete the hazardous waste generator inspection checklist)	
a.		If yes, electrolyte and/or other solid waste(s) identified as a characteristic hazardous waste, 40 CFR 260 - 272 requirements are met-273.13(a)(3)(i)/273.33(a)(3)(i)	
b.		If no, the handler manages the waste(s) in an environmentally sound manner that is in compliance with applicable state and federal regulation-273.13(a)(3)(ii)/273.33(a)(3)(ii)	
5.		Universal Waste Pesticides managed as follows to prevent releases -273.13(b)/273.33(b) **If not generated, go to 6.**	
a.		In a container that remains closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage, under reasonably foreseeable conditions-273.13(b)(l)/273.33(b)(l)	
b.		In a container that does not meet the conditions listed in 273.13(b)(l) [6.a. above], provided that the unacceptable container is over-packed in a container that does meet those requirements - 273.13(b)(2)/273.33(b)(2)	
c.		In a tank that meets the requirements of 40 CFR part 265 subpart J, except for 40 CFR 265.197(c), 265.200, and 265.201-273.13(b)(3)/273.33(b)(3)	
d.		In a transport vehicle or vessel that is closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage, under reasonably foreseeable conditions -273.13(4)/273.33(4)	
6.		Universal Waste Thermostats managed in a way that prevents releases of any universal waste or component of universal waste-273.13(c)/273.33(c) **If not generated, go to 7.**	
a.	✓	Universal waste thermostat that shows evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions is contained. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage-273.13(c)(l)/273.33(c)(l)	

b.	N/A	If mercury containing ampules are removed, the handler: (i) removes the ampules in a manner designed to prevent breakage, (ii) removes ampules only over or in a containment device, (iii) ensures that a mercury clean-up system is readily available to immediately transfer any spilled/leaked mercury from the containment device to an appropriate container per 40 CFR 262.34, (iv) immediately transfers any spilled/leaked mercury to an appropriate container per 40 CFR 262.34, (y) ensures area where ampules are removed is well ventilated and monitored to ensure compliance with OSHA exposure levels for mercury, (vi) ensure employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, (vii) stores removed ampules in closed, non-leaking containers that are in good condition, (viii) stored in containers with packing materials adequate to prevent breakage during storage, handling, and transportation- 273.13(c)(2)/273.33(c)(2) **If not generated, go to 7.**	
c.		Determines if the following exhibit a characteristic of hazardous waste: (A) mercury or clean-up residues resulting from spills or leaks: and/or (B) other solid waste generated as a result of removal of mercury containing ampules - 273.13(c)(3)(i)/273.33(c)(3)(i)	
d.		If the mercury, residues, and/or other solid waste do exhibit a characteristic of hazardous waste, it must managed per applicable hazardous waste requirements and the handler is the generator-273.13(c)(3)(ii)/273.33(c)(3)(ii)	
e.		If the mercury, residues, and/or other solid waste do **NOT** exhibit a characteristic of hazardous waste, the handler may manage the waste in compliance with federal, state, or local solid waste regulations -273.13(c)(3)(iii)/273.33(c)(3)(iii)	
7.	✓	Lamps are managed in a way that prevents releases of any universal waste or component of universal waste to the environment-273.13 (d)/273.33 (d)	
a.	X	Lamps are kept in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamp. The containers and packages are closed, and lack evidence of leakage, spillage, or damage that could cause leakage- 273.13(d)(1)/273.33(d)(1)	
b.	N/A	Universal waste lamps that show evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment are immediately cleaned up and placed in a container. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage or release of mercury or other hazardous constituents to the environment -273.13(d)(2)/273.33(d)(2)	

8.	✓	Storage over one year is solely for the purpose of accumulation of such quantities as necessary to facilitate, proper recovery, treatment, or disposal and the handler provides proof of this-273.15(b)/273.35(b)	
a.	✓	Small and large quantity handlers must demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received-273.15(c)/273.35(c), by: (1) placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received-27345(c)(l)/273.35(c)(l); (2) marking or labeling each individual item of universal waste with the date it became a waste or was received - 273.15(c)(2)/273.35(c)(2); (3) maintaining an inventory system on-site that identities, the earliest date that each universal waste became a waste or was received - 273.15(c)(3)/273.35(c)(3); (4) maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received –273.15(c)(4)/273.35(c)(4); (5) placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste items or a group of containers of universal waste became a waste or was received -273.15(c)(5)/27335(c)(5); or (6) any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received-273.15(c)(6)/273.35(c)(6). List and explain.	
9.	U/A	A small quantity/large quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes-273.17(a)/273.37(a)	
a.		A small quantity/large quantity handler of universal waste must determine whether any material resulting from the release is hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable requirements of 40 CFR parts 260 through 272. The handler is considered the generator of the material resulting from the release, and must manage it in compliance with 40 CFR 262 - 273.17(b)/273.37(b)	
10		Small quantity/large quantity handler of universal waste that self-transports universal waste off-site, becomes a universal waste transporter for those self-transportation activities and must comply with the transporter requirements of subpart D of this part while transporting the universal waste-273.18(b)/273.38(b)	
a.		If a universal waste being offered for off-site transportation **meets the definition of hazardous materials** under 49 CFR parts 171 through 180, a small quantity/ large quantity handler must package, label, mark and placard the shipment, and prepare the proper shipping papers in accordance with applicable DOT regulations (49 CFR parts 172 through 180)-273.18(c)/273.38(c) **If not, skip.**	
b.		Prior to sending a shipment to another universal waste handler, the originating handler must ensure that the receiving handler agrees to receive the shipment-273.18(d)/273.38(d)	

c.	N/A	If a shipment sent by a small quantity/large quantity handler to another handler or to a designated facility is rejected, the originating handler must either: (1) receive the waste back when notified that the shipment has been rejected, or (2) agree with the receiving handler on a destination facility to which the shipment will be sent- 273.18(e)/273.38(e) **If not, skip.**	
d.		Small, quantity/large quantity handler of universal waste may reject a shipment or a portion of a shipment containing universal waste that he has received from another handler. He must contact the originating handler to notify him of the rejections and to discuss reshipment. The handler must: (1) send the shipment back to the originating handler, or (2) if agreed to by both parties, send the shipment to a destination facility- 273.18(f)/273.38(f)	
e.		**If** a small quantity/large quantity handler of universal waste **receives a shipment containing hazardous waste that is not a universal waste**, the handler must immediately notify the appropriate regional EPA office of the illegal shipment, and provide the name, address, and phone number of the originating shipper. 273.18(g)/273.38(g)	
f.		**If** a small quantity/large quantity handler of universal waste **receives a shipment of non-hazardous, non-universal waste**, the handler may manage the waste in any way that is in compliance with applicable federal, state or local solid waste regulations. 273.18(h)/273.38(h)	
11.		Tracking Universal Waste Shipments 273.19/273.39 Small quantity handler -N/A - **Go to 12**	
a.		*Receipt of Shipment* - A large quantity handler must keep a record of each shipment received, per log, invoice, manifest, bill of lading, or other shipment document. The record for each shipment received must include: (1) name and address of the originating universal waste handler or foreign shipper from whom the universal waste was sent; (2) the quantity of each type of universal waste received; (3) the date of receipt of the shipment- 273.3 9(a)	
b.		*Shipments off-site* - A large quantity handler must keep a record of each shipment of universal waste sent from the handler to other facilities per log, invoice, manifest, bill of lading or other shipping document. The record for each shipment sent must include: (1) name and address of the universal waste handler, destination facility or foreign destination to whom the universal waste was sent; (2) the quantity of each type of universal waste sent; (3) the date the shipment left the facility.- 273.39(b)	
c.		*Record Retention* - Records for receipt of shipment [273.39(c)(l)] and records for shipments off-site [273.39(c)(2)] must be kept for at least three years from the date of receipt or departure from the facility, respectively.	
12.		Exports 273.30/273.40	

a.	N/A	Small quantity/large quantity handler who sends universal waste to a foreign destination other than to those OECD countries specified in 40 CFR 262.58(a)(1) (in which case the handler is subject to the requirements of 40 CFR part 262, subpart H) must: (1) comply with the requirements applicable to a primary exporter in 40 CFR 262.53, 262.56(a)(1) through (4), (6), and (b) and 262.57; (2) export such universal waste only upon consent of the receiving country and in conformance with the EPA Acknowledgement of Consent as defined in subpart E of part 262 of this chapter; and (3) provide a copy of the EPA Acknowledgement of Consent for the shipment to the transporter transporting the shipment for export.	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

13. Notes/Observations: N/A

Assessing Universal Waste *Transporters* (40 CFR 273, Subpart D)

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	N/A	Prohibited from: (1) disposing of universal waste; and (2) diluting or treating universal waste, except by responding to releases- 273.51	
2.		Transporter registered as a universal waste transporter in respective state, if required: List state regulatory citation	
3.		Waste management- 273.52 (1) Comply with all applicable DOT regulations in 49 CFR part 171 through 180 for transport of any universal waste that meets the definition of hazardous material in 49 CFR 171.8. (Since universal waste is not considered hazardous waste per EPA regulations, it is not considered hazardous waste under DOT regulations.)- 273.52(a) (2) Some universal waste materials are regulated by DOT as hazardous materials because they meet the criteria for one or more hazard classes specified in 49 CFR 173.2. Since universal waste shipments do not require a manifest, they may not be described by the DOT proper shipping name "hazardous waste, (l) or (s), n.o.s.", nor may the hazardous material shipping name be modified by adding the work "waste."- 273.52(b)	
4.		Storage Time Limits- 273.53 (1) Universal waste transporter may only store the universal waste at a universal waste transfer facility for ten days or less- 273.53(a) (2) If a transporter stores over 10 days, the transporter becomes a universal waste handler and must comply with the applicable requirements of subpart B or C of this part while storing the universal waste- 273.53(b)	

5.	N/A	Response to Releases- 273.54 (1) immediately contains all releases of universal wastes and other residues from universal wastes- 273.54(a). (2) determines whether any material resulting from the release is hazardous waste, and if so, the waste is subject to all applicable requirements of 40 CFR parts 260 through 272 and the transporter is subject to 40 CFR part 262 - 273.54(b)	
6.	↓	Off-site Shipments- 273.55 (1) Prohibited from transporting to a place other than a universal waste handler, a destination facility, or a foreign destination-273.55(a) (2) If meets the DOT definition of hazardous materials under 49 CFR 171.8, the shipment must be properly described on a shipping paper per DOT regulations under 49 CFR part 172. – 273.5(b).	
7.	↓	Exports- 273.56 A universal waste transporter transporting a shipment of universal waste to a foreign destination other than to those OECD countries specified in 40 CFR 262.58(a)(1)(in which case the transporter is subject to 40 CFR 262, subpart H) may not accept a shipment if the transporter knows the shipment does not conform to the EPA Acknowledgement of Consent. In addition, the transporter must ensure that: (1) a copy of the EPA Acknowledgement of consent accompanies the shipment- 273.56(a); and (2) the shipment is delivered to the facility designated by the person initiating the shipment- 273.56(b)	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

DOCUMENTATION: ***HOW*** are the facts known? ***WHO*** said what? ***WHEN*** did it happen? ***HOW*** long did it happen? and ***WHAT PROOF WAS OBTAINED?***

SUBPART CC: RCRA SUBPART CC CHECKLIST FOR AIR EMISSIONS AT LQGS AND TSDS

OVERVIEW: The Subpart CC regulations apply to Large Quantity Generators and Treatment, Storage and/Disposal Facilities that manage Hazardous Waste of Volatile Organic Concentrations of 500ppmw or more on an average annual basis in Tanks and Containers. For Tank Storage, there are two levels that a facility may use to manage their waste. Tank Level 1 requires a fixed roof tank which uses a maximum organic vapor pressure to comply with Subpart CC. Tank Level 2 designs can be one of five options. These are: (1) an Internal Floating Roof (2) an External Floating Roof (3) a tank with a Fixed Roof vented through a closed vent system to a control device (4) a Pressure Tank (5) a tank located inside an enclosure that is vented through a closed vent system to an enclosed combustion device.

Most of the facilities, will comply with Tank Level 1 which is the easiest to follow. The other option that will be seen a lot would be Tank Level 2 Option 3. The other options will be limited to a small number of facilities and should be referred to EPA for inspection. As a result, the emphasis of this checklist has been these two options.

For Container Storage, most of the facilities will store their waste in DOT approved containers. RCRA regulations already cover such storage and as a result, most facilities will be in compliance with the container storage regulations of the Subpart CC regulations. The checklist does not deal with Surface Impoundments because there are only a few active ones remaining in the Region. These should be referred to EPA for inspection.

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	Y	Is this facility a TSD or a Large Quantity Generator (LQG)? ***If NOT, STOP, Air Emissions-Subpart CC regulations do not apply.***	
2.	Y	Are there any units at the facility subject to the CC Rule?	
a.	N/A	If the answer is no, what is the reason? Ref. 40 CFR 264/5.1080(b) exceptions or 265.1083(c) or 264.1082(c) exemptions, or the general exclusions in 264/5.1(g), as applicable. **40 CFR 264/265.1080(b) exemptions:** (1) Unit did not receive HW after 12/6/96 ___ (2) Using containers of less than 26 gallons capacity ___ (3) Unit undergoing closure ___ (4) Units used in an on-site RCRA or CERCLA clean-up ____ (5) Mixed Radioactive and hazardous waste____ (6) Units with CAA, NESHAPS or NSPS controls ____ (7) Tanks with process vents (Subject to Subpart AA) ____ **40 CFR 265.1083(c) exemptions:** (8) Waste stream less than 500 ppmw average VOC ___ If so; was waste determination done per 265.1084? ___YES ___NO (9) All waste placed in unit meets 268.40 (LDR) limits____ (10) Tank is used for bulk feed to incinerator and requirements of 265.1083(5)(i)-(iii) are met ____ **40 CFR 265.1 General exclusions/exemptions:** (11) Hazardous waste recycling unit exemption ___ (12) Satellite accumulation area ____ (13) Totally enclosed treatment facility exemption ____ (14) Elementary neutralization unit ____ (15) Waste water treatment in tanks exemption____ (16) Emergency or spill management exemption ____ (17) Biological treatment with 95% efficiency ____ Except if exemption is based on (8) above, then **STOP**, subpart CC does not apply.	

3.	Y	Is the average volatile organic concentration of each waste management unit more than 500 ppmw determined on an average annual basis at the point of waste origination? **NOTE: If facility claims that its waste is below 500 ppm, then the waste determination documentation should be in the operating record. Inspector should review this documentation and obtain a copy.**	
a.	Y	Are there units subject to Subpart CC? If YES, does the facility have a list of each unit and the concentration in its operating record? If NO, indicate if the determination for each unit is in the facility operating record?- 264.1089/265.1090	
4.	N/A	**FOR EACH UNIT, FOR WHICH A DETERMINATION HAS BEEN MADE THAT THE HAZARDOUS WASTE CONTAINS LESS THAN 500 PPM OF VOCS, ANSWER THE FOLLOWING QUESTIONS.**	
a.		How was waste determination done? Using Knowledge or Sampling? – Ref 40 CFR 264.1083/265.1084	
b.		If knowledge was used, is there any documentation on file?	
c.		Is it adequate?	
d.		If sampling was used, does the facility have a written sampling plan?	
e.		If facility used sampling, was the sampling done by an EPA approved method? Which method?	
f.		Has the waste stream changed since the initial waste determination was done which would cause the character of the waste to change or to exceed the threshold levels for applicability of Subpart CC?	
g.		If so, was a new waste determination done? If YES, repeat 4 (a)-(e)	
	✓	**CONTAINERS:** Ref. 40 CFR 264.1086/265.1087 **LIGHT LIQUID SERVICE:** For a hazardous waste to be in light liquid service, the vapor pressure of one or more of the organic constituents in the material must be greater than 0.3 kilopascals at 20 degrees Centigrade and the total concentration of pure organic constituents having a vapor pressure greater than 0.3 kilopascals at 20 degrees Centigrade is equal to or greater than 20 percent by weight.	
1.	✓	**LEVEL ONE:** There should be no waste stabilization. Containers must be >0.1 cubic meters (26.4 gal) and < or = to 122 gallons. If the organic waste is not in light liquid service, it can be above 122 gallons.	
a.	✓	**OPTION 1-** The container meets DOT specifications.	
b.	N/A	**OPTION 2-** Use a cover and closure device on the container and ensure that there are no visible gaps in the interior of the container or holes in the covers.	

c.	N/A	**OPTION 3-** Use vapor suppressing barrier on or above the hazardous waste in the container.	
2.		**LEVEL TWO:** There should be no waste stabilization. Containers are larger than 0.46 cubic meters (122 gal) and are in light liquid service.	
a.		**OPTION 1-** The container meets DOT specifications.	
b.		**OPTION 2-** Operates with no detectible emissions from the container under Method 21.	
c.		**OPTION 3-** Demonstrated to be vapor tight within the last twelve months using Method 27.	
3.		**LEVEL THREE:** Container must be used for waste stabilization. Vent vapors from containers and remove or destroy them in a control device. Put container in a "Procedure T Enclosure" and, vent vapors, and destroy them in a control device.	
4.		Is the level of control used at the facility in compliance? **NOTE: Most facilities will be in compliance if they are not conducting waste stabilization and if they store their waste in DOT approved 55-gallon drums.**	
		TANKS SUBJECT TO SUBPART CC Ref 40 CFR 264.1084/265.1085	
1.		Is HW having an average VO concentration of more than 500 ppmw placed in a tank with either level 1 or level 2 controls?-264.1084(b)(1)/265.1085(b)(1)	
a.		Were the tanks inspected for leaks before waste was placed into the tank? If yes, when was it done?	
b.		During the tank storage of hazardous waste, was an annual inspection done on the tanks described above? If yes, when was it done?	
		Note: The fixed roof and its closure devices shall be visually inspected by the owner/operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank walls; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. An initial inspection should be done before any waste is stored in the tank and at least once annually thereafter.	
c.		Indicate options/level for each tank _____ _____ _____ _____	

2.	N/A	**For tanks with level 1 control:** **Tank must meet 3 conditions for level 1 control:** (1) Waste maximum organic vapor pressure less than cutoff for tank design capacity (2) No heating ≥temperatures at which vapor pressure is determined (Vapor pressure may be determined by knowledge or by measurement). (3) No waste stabilization in tank	
a.		Facility is in compliance. **NOTE: Inspector should check for vapor pressure determinations, collect information and bring it back to office.**	
3.		**FOR TANKS WITH LEVEL 2/OPTION 3 CONTROLS** **OPTION 3- Fixed roof tank venting through a closed vent system, to a control device that would destroy or reduce at least 95% of vapors.**	
a.		Is the fixed roof forming a continuous barrier over the entire surface area of the liquid in the tank?	
b.		Are emissions vented to a control device?	
c.		Are all openings in the roof not venting to the control device fixed with a closure device?	
d.		If the vapor pressure underneath the fixed roof cover is less than atmospheric pressure when control device is working, and the closure device is closed, are there any visible cracks, holes, gaps, or other open spaces between cover opening and closure device?	
e.		If the vapor pressure below the fixed roof cover is equal to or greater than atmospheric pressure when the control device is working, are the cover and closure device designed to operate at NDE?	
f.		Are the cover and closure devices closed at all times and the vapor headspace vented to a control device except when O/O is: (1) performing inspections or (2) performing maintenance or other normal operations or (3) accessing the tank or (4) removing accumulated sludge and other residues from the bottom of the tank.	
		NOTE: Inspector should collect monitoring data from the control device and the design data and bring it back to the office for review. For all other options, refer to applicable regulations at 264.1084/265.1085	

ATTACHMENT 4

RECEIPT FOR DOCUMENTS AND SAMPLES

(One Page)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
INDUSTRIAL LAMINATES / NORPLEX INC
Facility Address
665 LYBRAND ST POSTVILLE IA 52162

Documents Collected? YES ✓ (list below) NO ___

Samples Collected? YES ___ (list below) NO ✓ Split Samples: YES ___ NO ✓

Documents/Samples were: 1) Received no charge ✓ 2) Borrowed ___ 3) Purchased ___

Amount Paid: $_____ Method: Cash ___ Voucher ___ To Be Billed ___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1) MAP OF FACILITY (1 PAGE)
2) CONTINGENCY PLAN (11 PAGES)
3) INSPECTION LOGS (11 PAGES)
4) TRAINING MATERIALS (10 PAGES)
5) TRAINING LOGS (2 PAGES)
6) MANIFESTS (32 PAGES)
7) WASTE PROFILE INFO (29 PAGES)
8) JOB DESCRIPTIONS (3 PAGES)
9) MGMT TRAINING RECORDS (2 PAGES)
10) SPILL LOGS (2 PAGES)
11) BILL OF LADING (1 PAGE)

Facility Representative (print)	Signature/Date
Alan Johnson	A Johnson 5/14/2012
Inspector (print)	**Signature/Date**
HEATHER K. WOOD	Heather K. Wood 5/14/12
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev:1/20/93)

ATTACHMENT 5

CONFIDENTIALITY NOTICE

(One Page)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	
INDUSTRIM LAMINATES / NORPLEX INC.	
Facility Address	
665 LYBRAND ST POSTVILLE IA 52162	
Inspector (print)	
HEATHER K. WOOD	5/14/12
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
Alan Johnson	Alan Johnson 5/14/2012

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

Attachment 5 Page 1 of 1

(Rev: 11/15/99)

ATTACHMENT 6

NOTICE OF PRELIMINARY FINDINGS

(One Page)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: INDUSTRIAL LAMINATES/NORPLEX INC.
ADDRESS: 665 LYBRAND ST
POSTVILLE IA 52162
EPA ID NUMBER: IAD073489288 **DATE:** 5/14/12

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. FAILURE TO LABEL USED OIL TANK AS "USED OIL" (40 CFR 279.22(c)(1))
2. FAILURE TO CLOSE CONTAINERS OF UNIVERSAL WASTE LAMPS (40 CFR 273.13(d)(1))
3. FAILURE TO CONDUCT WEEKLY INSPECTIONS OF CONTAINER STORAGE AREAS (40 CFR 262.34(a)(1)(i) → 265.174)
4. FAILURE TO CONDUCT ANNUAL TRAINING OF HAZARDOUS WASTE PERSONNEL (40 CFR 262.34(a)(4) → 265.16(c))
5. (14M) FAILURE TO TRANSPORT USED OIL FILTERS TO A RECOGNIZED USED OIL RECYCLING CENTER (40 CFR 279.24(a)(3))
6.
7.

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Alan Johnson **TITLE:** Plant Manager

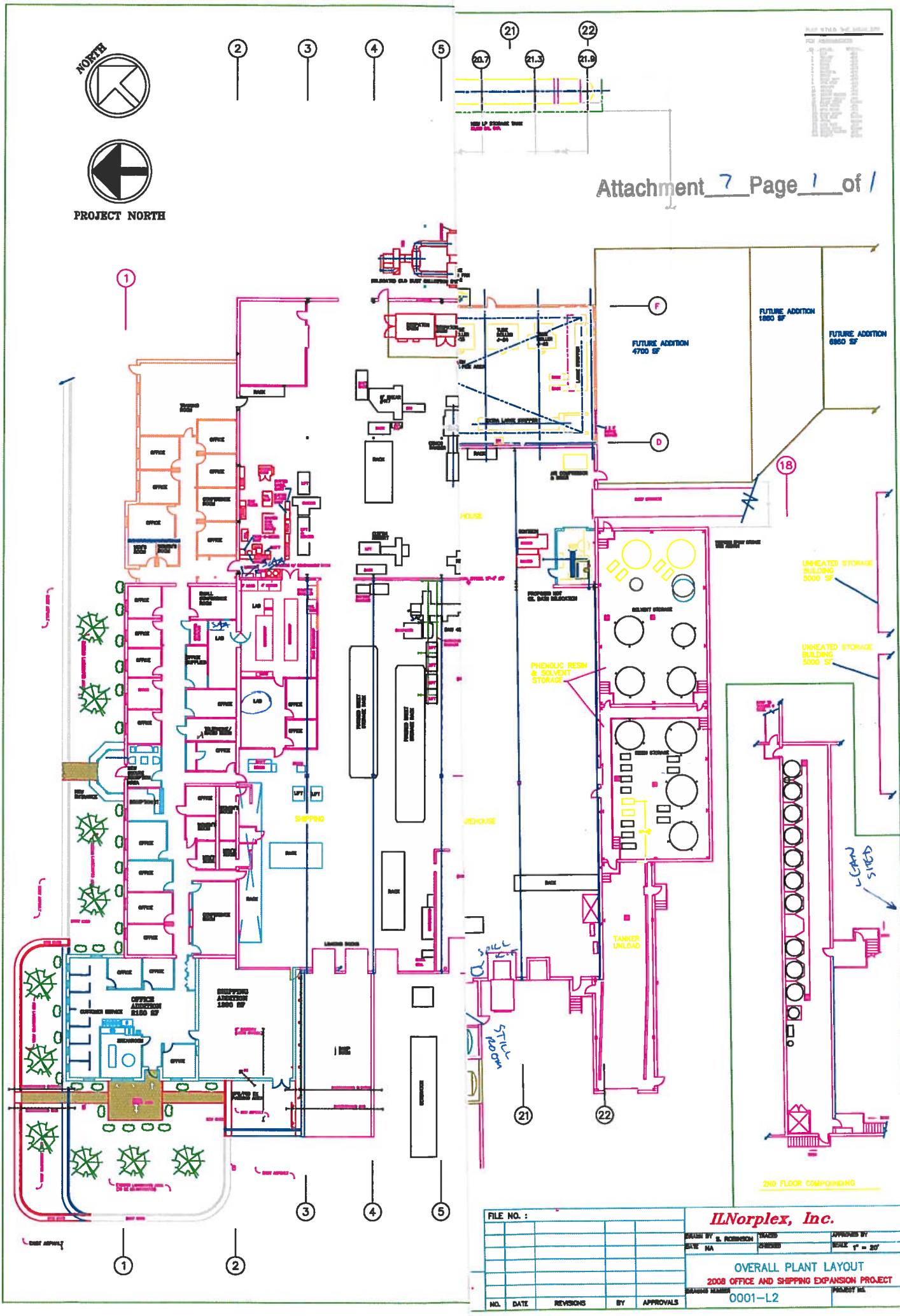
SIGNATURE: Alan Johnson

This document was prepared by HEATHER K. WOOD

ATTACHMENT 7

MAP OF THE FACILITY

(One Page)


NORTH
PROJECT NORTH
Attachment 7 Page 1 of 1
FUTURE ADDITION 4700 SF
FUTURE ADDITION 1800 SF
FUTURE ADDITION 6850 SF
UNHEATED STORAGE BUILDING 5000 SF
UNHEATED STORAGE BUILDING 5000 SF
PHENOLIC RESIN & SOLVENT STORAGE
TANKER UNLOAD
SHIPPING
2ND FLOOR COMPOUNDING
FILE NO. :
ILNorplex, Inc.
OVERALL PLANT LAYOUT
2008 OFFICE AND SHIPPING EXPANSION PROJECT
0001-L2
NO. DATE REVISIONS BY APPROVALS

ATTACHMENT 8

PHOTOGRAPHIC DOCUMENTATION

(18 Pages)

PHOTO LOG

Facility Name / City: Industrial Laminates/Norplex Inc.
665 Lybrand Street
Postville, Iowa
Facility ID #: IAD073489288
Date : May 14, 2012
Photographer: Heather Wood
Type of Camera: Canon Powershot SX130 IS, Serial # 112062054881.
Digital Recording Media: Flashcard
All digital photos were copied by: Heather Wood on May 18, 2012.
All digital photos were copied to: Tetra Tech EM Inc. desktop computer
Original copy is stored in: Tetra Tech EM Inc.'s internal office server. Digital photos were downloaded to server by Heather Wood. No changes were made in the original image files prior to storage on the server.

Report Photo #	Photo-grapher	Date	Approx. Time	File Name	Description
1	Heather Wood	5/14/12	1444	IL_001.jpg	This photograph shows the exterior of the facility, looking southeast.
2	Heather Wood	5/14/12	1445	IL_002.jpg	This photograph shows the exterior of the facility, looking southwest.
3	Heather Wood	5/14/12	1007	IL_003.jpg	This photograph shows the still (see arrow) and containers of waste, including scrap, used solvent rags, and still bottoms, in the still room container storage area (CSA).
4	Heather Wood	5/14/12	957	IL_004.jpg	This photograph shows a container of scrap (left) and a container of in-process material in the Treater 1 CSA. The insets show the labels.
5	Heather Wood	5/14/12	1000	IL_005.jpg	This photograph shows containers of raw materials and a container of in-process material (see arrow) in an area near the still room. The inset shows the label.
6	Heather Wood	5/14/12	1007	IL_006.jpg	This photograph shows containers of hazardous waste (see solid arrows), including two containers of scrap, one of melamine waste, and one of used solvent rags, and two containers of in-process materials (see dashed arrows) in the Treater 4-6 CSA.
7	Heather Wood	5/14/12	1007	IL_007.jpg	This photograph shows three containers of scrap in the laboratory satellite accumulation area (SAA) (see arrows). The container on the left was opened to verify its contents, but was closed when I arrived at the SAA. The label on this container is obscured by the trash bag and is indicated by the arrow.
8	Heather Wood	5/14/12	1014	IL_008.jpg	This photograph shows a fire extinguisher and containers of hazardous waste, including scrap, used solvent rags, and still bottoms, in the still room CSA.
9	Heather Wood	5/14/12	1058	IL_009.jpg	This photograph shows containers of hazardous waste, including scrap, used solvent rags, and still bottoms, in the still room CSA.
10	Heather Wood	5/14/12	1041	IL_010.jpg	This photograph shows 88 containers of hazardous waste, including scrap, used solvent rags, melamine waste, and still bottoms, in the lean shed CSA.
11	Heather Wood	5/14/12	1054	IL_011.jpg	This photograph shows the contents of the chemical storage cabinet, including nine containers of laboratory waste (see arrows).

Report Photo #	Photo-grapher	Date	Approx. Time	File Name	Description
12	Heather Wood	5/14/12	1056	IL_012.jpg	This photograph shows three of the containers of laboratory waste shown in Photograph 11.
13	Heather Wood	5/14/12	1056	IL_013.jpg	This photograph shows two of the containers of laboratory waste shown in Photograph 11.
14	Heather Wood	5/14/12	945	IL_014.jpg	This photograph shows the 9,000-gallon used oil storage tank in the maintenance area.
15	Heather Wood	5/14/12	947	IL_015.jpg	This photograph shows the 350-gallon used oil storage tank (**NOPF No. 1**).
16	Heather Wood	5/14/12	946	IL_016.jpg	This photograph shows three unpunctured used oil filters draining into the smaller used oil storage tank.
17	Heather Wood	5/14/12	944	IL_017.jpg	This photograph shows the parts washer and the adjacent SAA container of used parts washing solvent in a maintenance area. The inset shows the label.
18	Heather Wood	5/14/12	949	IL_018.jpg	This photograph shows one open container of high-intensity discharge (HID) lamps (**NOPF No. 2**) and two containers of used 4-foot lamps in the boiler room.
19	Heather Wood	5/14/12	949	IL_019.jpg	This photograph shows the label on the container of used 4-foot lamps on the left in Photograph 18. The other container was similarly labeled.
20	Heather Wood	5/14/12	949	IL_020.jpg	This photograph shows a container of used 8-foot lamps in the boiler room. The inset shows the label.
21	Heather Wood	5/14/12	1046	IL_021.jpg	This photograph shows a container of used 8-foot lamps in the outbuilding. The inset shows the label.
22	Heather Wood	5/14/12	1048	IL_022.jpg	This photograph shows two containers of used 8-foot lamps in the outbuilding. The inset shows the labeling on the container on the right. The container on the left is similarly labeled.
23	Heather Wood	5/14/12	1049	IL_023.jpg	This photograph shows a container of used 8-foot lamps in the outbuilding. The inset shows the label.
24	Heather Wood	5/14/12	1047	IL_024.jpg	This photograph shows the label on a container of used 4-foot lamps in the outbuilding.
25	Heather Wood	5/14/12	1047	IL_025.jpg	This photograph shows an open container of used HID lamps in the outbuilding (**NOPF No. 2**).
26	Heather Wood	5/14/12	941	IL_026.jpg	This photograph shows one of the two containers of used batteries. This container is in the server room.
27	Heather Wood	5/14/12	1044	IL_027.jpg	This photograph shows the truck trailer holding empty containers destined for recycling.
28	Heather Wood	5/14/12	1015	IL_028.jpg	This photograph shows the container of remediation-derived well water in the well water CSA. The inset shows the label.
29	Heather Wood	5/14/12	1041	IL_029.jpg	This photograph shows spill kits in the lean shed CSA.
30	Heather Wood	5/14/12	1042	IL_030.jpg	This photograph shows a telephone and a fire extinguisher in the lean shed.
31	Heather Wood	5/14/12	1001	IL_031.jpg	This photograph shows the spill kit just outside the still room.
32	Heather Wood	5/14/12	959	IL_032.jpg	This photograph shows a fire extinguisher near the Treater 1 CSA.

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the exterior of the facility, looking southeast.	1
	CLIENT	U.S. Environmental Protection Agency (EPA)	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the exterior of the facility, looking southwest.	2
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the still (see arrow) and containers of waste, including scrap, used solvent rags, and still bottoms, in the still room container storage area (CSA).	3
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a container of scrap (left) and a container of in-process material in the Treater 1 CSA. The insets show the labels.	4
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows containers of raw materials and a container of in-process material (see arrow) in an area near the still room. The inset shows the label.	5
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows containers of hazardous waste (see solid arrows), including two containers of scrap, one of melamine waste, and one of used solvent rags, and two containers of in-process materials (see dashed arrows) in the Treater 4-6 CSA.	6
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows three containers of scrap in the laboratory satellite accumulation area (SAA) (see arrows). The container on the left was opened to verify its contents, but was closed when I arrived at the SAA. The label on this container is obscured by the trash bag and is indicated by the arrow.	7
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a fire extinguisher and containers of hazardous waste, including scrap, used solvent rags, and still bottoms, in the still room CSA.	8
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

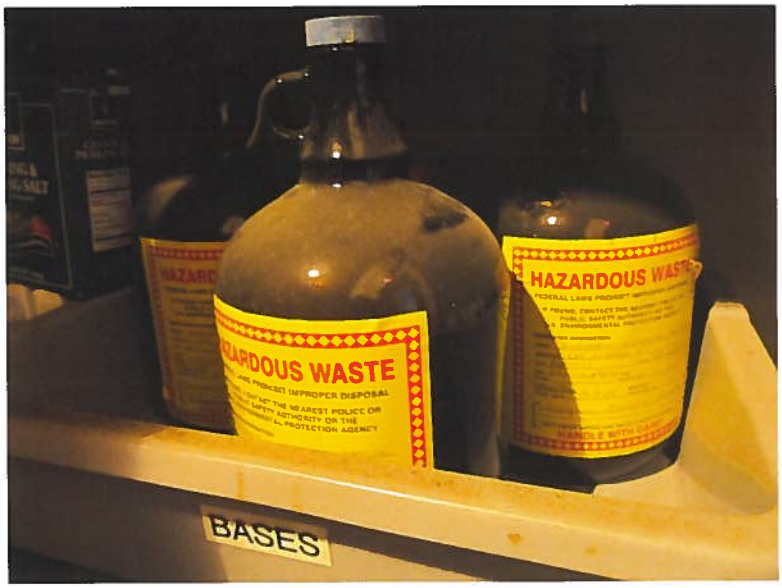
Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows containers of hazardous waste, including scrap, used solvent rags, and still bottoms, in the still room CSA.	9
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows 88 containers of hazardous waste, including scrap, used solvent rags, melamine waste, and still bottoms, in the lean shed CSA.	10
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

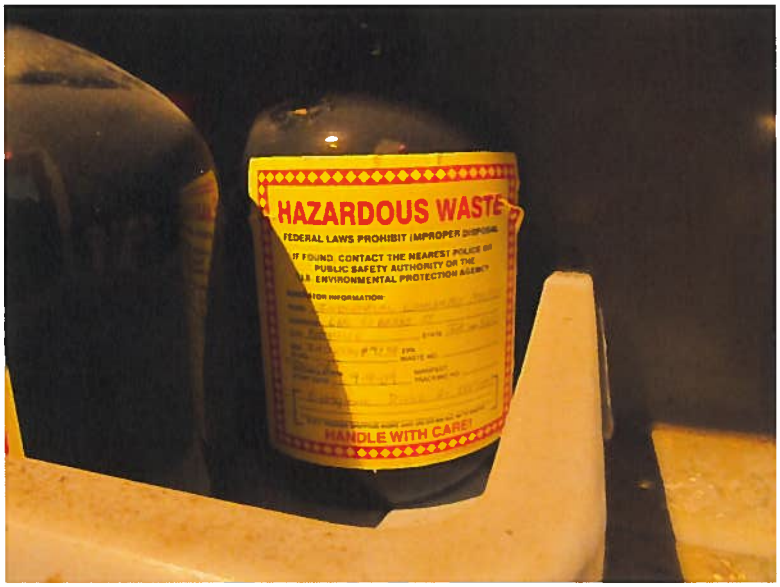
Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the contents of the chemical storage cabinet, including nine containers of laboratory waste (see arrows).	11
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows three of the containers of laboratory waste shown in Photograph 11.	12
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

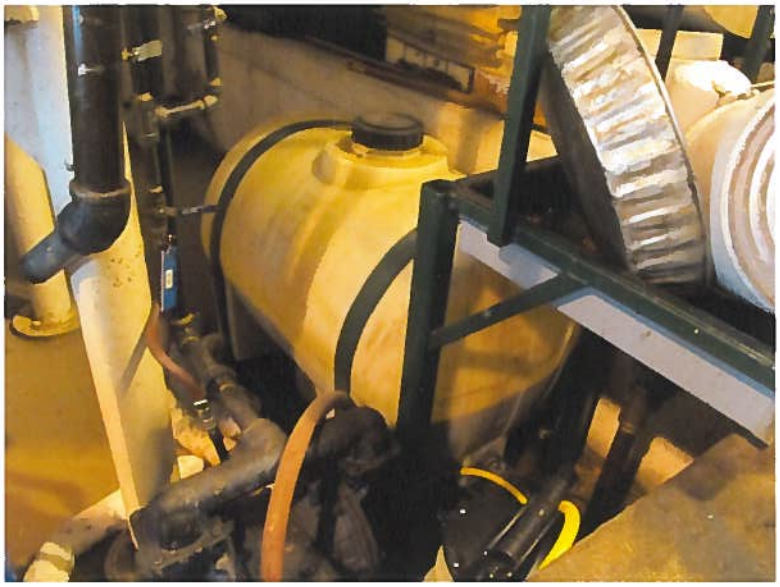
Industrial Laminates/Norplex Inc.
Postville, Iowa



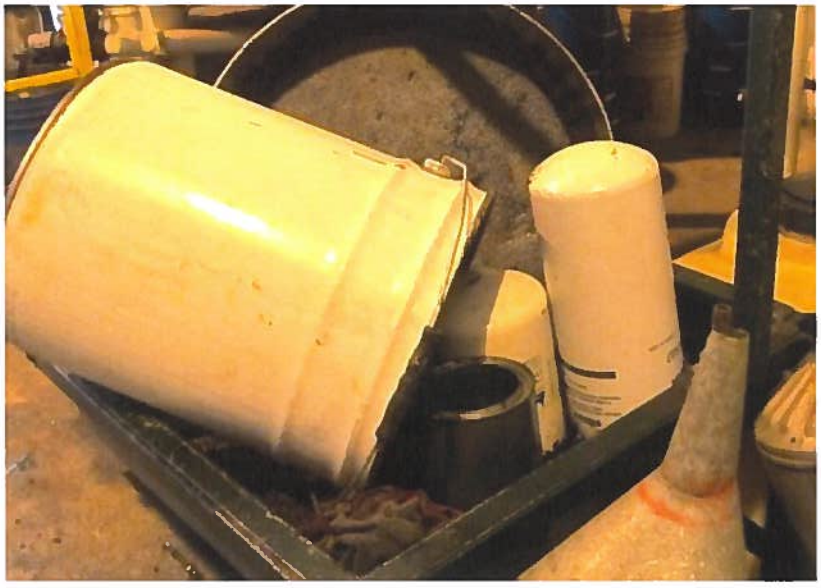
TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows two of the containers of laboratory waste shown in Photograph 11.	13
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the 9,000-gallon used oil storage tank in the maintenance area.	14
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the 350-gallon used oil storage tank (**NOPF No. 1**).	15
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows three unpunctured used oil filters draining into the smaller used oil storage tank.	16
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the parts washer and the adjacent SAA container of used parts washing solvent in a maintenance area. The inset shows the label.	17
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows one open container of high-intensity discharge (HID) lamps (**NOPF No. 2**) and two containers of used 4-foot lamps in the maintenance area.	18
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the label on the container on the left in Photograph 18. The other container was similarly labeled.	19
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a container of used 8-foot lamps in the maintenance area. The inset shows the label.	20
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a container of used 8-foot lamps in an outbuilding. The inset shows the label.	21
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows two containers of used 8-foot lamps in the outbuilding. The inset shows the labeling on the container on the right. The container on the left is similarly labeled.	22
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a container of used 8-foot lamps in the outbuilding. The inset shows the label.	23
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the label on a container of used 4-foot lamps in the outbuilding.	24
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows an open container of used HID lamps in the outbuilding (**NOPF No. 2**).	25
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows one of the two containers of used batteries. This container is in the server room.	26
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the truck trailer holding empty containers destined for recycling.	27
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

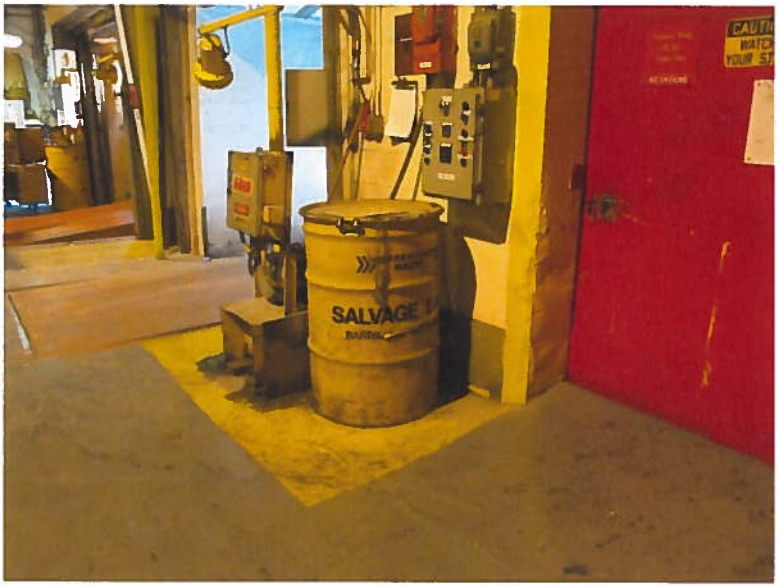
TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the container of remediation-derived well water in the well water CSA. The inset shows the label.	28
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows spill kits in the lean shed CSA.	29
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a telephone and a fire extinguisher in the lean shed.	30
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

Industrial Laminates/Norplex Inc.
Postville, Iowa



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the spill kit just outside the still room.	31
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a fire extinguisher near the Treater 1 CSA.	32
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

ATTACHMENT 9

2011 BIENNIAL REPORT AND AMENDMENT

(16 Pages)

OMB# 2050-0024; Expires 12/31/2014

AWMD / WEMM
FEB 27 2012
RECEIVED

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**

1. Reason for Submittal

MARK ALL BOX(ES) THAT APPLY

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)
- ☐ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____)
- ☒ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ Site was a TSD facility and/or generator of ≥1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number: I A D 0 7 3 4 8 9 2 8 8

3. Site Name

Name: Industrial Laminates / Norplex Inc.

4. Site Location Information

Street Address: 665 Lybrand St. / PO Box 977

City, Town, or Village: Postville | County: Allamakee

State: IA | Country: USA | Zip Code: 52162

5. Site Land Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

6. NAICS Code(s) for the Site (at least 5-digit codes)

A. 3 2 6 1 3 0 | C. | B. | D.

7. Site Mailing Address

Street or P.O. Box: 665 Lybrand St. / PO Box 977

City, Town, or Village: Postville

State: IA | Country: USA | Zip Code: 52162

8. Site Contact Person

First Name: Jon | MI: B | Last: Thorstenson

Title: Manufacturing Engineer

Street or P.O. Box: 665 Lybrand St. / PO Box 977

City, Town or Village: Postville

State: IA | Country: USA | Zip Code: 52162

Email: jthorstenson@norplex-micarta.com

Phone: 563-864-7321 | Ext.: | Fax: 563-864-4231

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner: Honeywell | Date Became Owner: 1/01/1982

Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street or P.O. Box: 101 Columbia Rd.

City, Town, or Village: Morristown | Phone:

State: NJ | Country: USA | Zip Code: 07962

B. Name of Site's Operator: Industrial Laminates / Norplex Inc. | Date Became Operator: 9/15/1996

Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.

Y [✓] N [ ] **1. Generator of Hazardous Waste**
If "Yes", mark only one of the following – a, b, or c.

- [✓] a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; **or** Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; **or** Generates, in any calendar month, **or** accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- [ ] b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- [ ] c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-4.

Y [ ] N [✓] **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y [ ] N [✓] **3. United States Importer of Hazardous Waste**

Y [ ] N [✓] **4. Mixed Waste (hazardous and radioactive) Generator**

Y [ ] N [✓] **5. Transporter of Hazardous Waste**
If "Yes", mark all that apply.
- [ ] a. Transporter
- [ ] b. Transfer Facility (at your site)

Y [ ] N [✓] **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

Y [ ] N [✓] **7. Recycler of Hazardous Waste**

Y [ ] N [✓] **8. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark all that apply.
- [ ] a. Small Quantity On-site Burner Exemption
- [ ] b. Smelting, Melting, and Refining Furnace Exemption

Y [ ] N [✓] **9. Underground Injection Control**

Y [ ] N [✓] **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

Y [ ] N [✓] **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**

- a. Batteries [ ]
- b. Pesticides [ ]
- c. Mercury containing equipment [ ]
- d. Lamps [ ]
- e. Other (specify) _____ [ ]
- f. Other (specify) _____ [ ]
- g. Other (specify) _____ [ ]

Y [ ] N [✓] **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y [ ] N [✓] **1. Used Oil Transporter**
If "Yes", mark all that apply.
- [ ] a. Transporter
- [ ] b. Transfer Facility (at your site)

Y [ ] N [✓] **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark all that apply.
- [ ] a. Processor
- [ ] b. Re-refiner

Y [ ] N [✓] **3. Off-Specification Used Oil Burner**

Y [ ] N [✓] **4. Used Oil Fuel Marketer**
If "Yes", mark all that apply.
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You can **ONLY** Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y☐ N☑ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories **See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:**

☐ a. College or University

☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university

☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y☐ N☑ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D007	D008	D039	F003	F005	

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☑ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
A. Johnson	Alan Johnson / Plant Manager	02/22/2012

OMB# 2050-0024; Expires 12/31/2014

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Industrial Laminates / Norplex Inc.

EPA ID Number I A D 0 7 3 4 8 9 2 8 8

U.S. ENVIRONMENTAL PROTECTION AGENCY

2011 Hazardous Waste Report

GM FORM

WASTE GENERATION AND MANAGEMENT

Sec. 1

A. Waste description: Generic Description: Phenolic/epoxy resin and solvent
US DOT Description: UN1993, waste flammable liquids, n.o.s. (toluene, acetone), 3, PGIII

B. EPA hazardous waste code(s): D 0 0 1 | F 0 0 3 | F 0 0 5

C. State hazardous waste code(s):

D. Source code: G 1 3

Management Method code for Source code G25: H

E. Form code: W 2 0 3

F. Quantity generated in 2011: 4 2 7 9 2 1 . 0

UOM: 1

Density: lbs/gal sg

G. Waste minimization code:

Sec. 2 Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site?

- ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
- ☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011	On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011
H		H	

Sec. 3 A. Was any of this waste shipped off site in 2011 for treatment, disposal, or recycling?

- ☒ Yes (CONTINUE TO ITEM B)
- ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped	C. Off-site Management Method code shipped to	D. Total quantity shipped in 2011
Site 1	A R D 9 8 1 0 5 7 8 7 0	H 0 6 1	4 2 7 9 2 1 . 0
Site 2		H	
Site 3		H	

Comments:

OMB# 2050-0024; Expires 12/31/2014

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Industrial Laminates / Norplex Inc.

EPA ID Number | I | A | D | 0 | 7 | 3 | 4 | 8 | 9 | 2 | 8 | 8 |

U.S. ENVIRONMENTAL PROTECTION AGENCY

2011 Hazardous Waste Report

GM FORM

WASTE GENERATION AND MANAGEMENT

Sec. 1

A. Waste description: Generic Description: Melamine resin and solvent
US DOT Description: UN1993, waste flammable liquids, n.o.s. (n-butyl alcohol, toluene), 3, PGIII

B. EPA hazardous waste code(s): | D | 0 | 0 | 1 | | F | 0 | 0 | 3 | | F | 0 | 0 | 5 |

C. State hazardous waste code(s):

D. Source code: | G | 1 | 3 |

Management Method code for Source code G25: | H | | | |

E. Form code: | W | 1 | 1 | 3 |

F. Quantity generated in 2011: | | | | 6 | 2 | 8 | 4 | 8 | . | 0 |

UOM | 1 |

Density | | | . | | | lbs/gal | | sg

G. Waste minimization code:

Sec. 2

Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site?

- ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
- ☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011	On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011
H		H	

Sec. 3

A. Was any of this waste shipped off site in 2011 for treatment, disposal, or recycling?

- ☒ Yes (CONTINUE TO ITEM B)
- ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped	C. Off-site Management Method code shipped to	D. Total quantity shipped in 2011
Site 1	A R D 9 8 1 0 5 7 8 7 0	H 0 6 1	6 2 8 4 8 . 0
Site 2		H	
Site 3		H	

Comments:

OMB# 2050-0024; Expires 12/31/2014

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Industrial Laminates / Norplex Inc.

EPA ID Number | I | A | D | 0 | 7 | 3 | 4 | 8 | 9 | 2 | 8 | 8 |

U.S. ENVIRONMENTAL PROTECTION AGENCY

2011 Hazardous Waste Report

GM FORM

WASTE GENERATION AND MANAGEMENT

Sec. 1

A. Waste description: Generic Description: Rags containing solvent
US DOT Description: UN3175, waste solids containing flammable liquids, n.o.s. (toluene, acetone), 4.1, PGII

B. EPA hazardous waste code(s): D001 F003 F005

C. State hazardous waste code(s):

D. Source code: G13

Management Method code for Source code G25: H

E. Form code: W002

F. Quantity generated in 2011: 10264.0

UOM: 1

Density: lbs/gal sg

G. Waste minimization code:

Sec. 2

Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site?

- ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
- ☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011	On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011
H		H	

Sec. 3

A. Was any of this waste shipped off site in 2011 for treatment, disposal, or recycling?

- ☒ Yes (CONTINUE TO ITEM B)
- ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped	C. Off-site Management Method code shipped to	D. Total quantity shipped in 2011
Site 1	ARD981057870	H061	10264.0
Site 2		H	
Site 3		H	

Comments:

OMB# 2050-0024; Expires 12/31/2014

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Industrial Laminates / Norplex Inc.

EPA ID Number: IADD073489288

U.S. ENVIRONMENTAL PROTECTION AGENCY

2011 Hazardous Waste Report

GM FORM

WASTE GENERATION AND MANAGEMENT

Sec. 1

A. Waste description: Generic Description: Still bottoms
US DOT Description: UN3175, waste solids containing flammable liquids, n.o.s. (ethanol, isopropanol), 4.1, PGII

B. EPA hazardous waste code(s): D001 F003 F005

C. State hazardous waste code(s):

D. Source code: G24

Management Method code for Source code G25: H

E. Form code: W403

F. Quantity generated in 2011: 10113.0

UOM: 1

Density: lbs/gal sg

G. Waste minimization code:

Sec. 2

Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site?

- ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
- ☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011	On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011
H		H	

Sec. 3

A. Was any of this waste shipped off site in 2011 for treatment, disposal, or recycling?

- ☒ Yes (CONTINUE TO ITEM B)
- ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped	C. Off-site Management Method code shipped to	D. Total quantity shipped in 2011
Site 1	ARD981057870	H061	10133
Site 2		H	
Site 3		H	

Comments:

OMB# 2050-0024; Expires 12/31/2014

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Industrial Laminates / Norplex Inc.

EPA ID Number: IADD073489288

U.S. ENVIRONMENTAL PROTECTION AGENCY

2011 Hazardous Waste Report

GM FORM

WASTE GENERATION AND MANAGEMENT

Sec. 1

A. Waste description: Generic Description: Part washer
US DOT Description: NA1993, waste combustible liquid, n.o.s. (petroleum naptha), PGIII

B. EPA hazardous waste code(s): D039

C. State hazardous waste code(s):

D. Source code: G13

Management Method code for Source code G25: H

E. Form code: W202

F. Quantity generated in 2011: 85.0

UOM: 5

Density: 8.34 ☑ lbs/gal ☐ sg

G. Waste minimization code:

Sec. 2 Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site?

- ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
- ☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011	On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011
H		H	

Sec. 3 A. Was any of this waste shipped off site in 2011 for treatment, disposal, or recycling?

- ☒ Yes (CONTINUE TO ITEM B)
- ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped	C. Off-site Management Method code shipped to	D. Total quantity shipped in 2011
Site 1	IADD098027592	H141	85.0
Site 2		H	
Site 3		H	

Comments:

OMB# 2050-0024; Expires 12/31/2014

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Industrial Laminates / Norplex Inc.

EPA ID Number: I A D 0 7 3 4 8 9 2 8 8

U.S. ENVIRONMENTAL PROTECTION AGENCY

2011 Hazardous Waste Report

GM FORM

WASTE GENERATION AND MANAGEMENT

Sec. 1

A. Waste description: Generic Description: Well water remediation
US DOT Description: UN1993, waste flammable liquids, n.o.s. (methanol, MEK), 3, PGII

B. EPA hazardous waste code(s): D 0 0 1 | D 0 0 7 | D 0 0 8 | F 0 0 3 | F 0 0 5

C. State hazardous waste code(s):

D. Source code: G 4 5

Management Method code for Source code G25: H

E. Form code: W 1 1 3

F. Quantity generated in 2011: 4 8 6 2 2 . 2

UOM: 1

Density: lbs/gal sg

G. Waste minimization code:

Sec. 2

Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site?

- ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
- ☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011	On-site Management Method code	Quantity treated, disposed, or recycled on site in 2011
H		H	

Sec. 3

A. Was any of this waste shipped off site in 2011 for treatment, disposal, or recycling?

- ☒ Yes (CONTINUE TO ITEM B)
- ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped	C. Off-site Management Method code shipped to	D. Total quantity shipped in 2011
Site 1	I L D 0 9 8 6 4 2 4 2 4	H 0 4 0	2 2 1 0 1 . 0
Site 2	T X D 0 0 0 8 3 8 8 9 6	H 0 4 0	2 6 5 2 1 . 2
Site 3		H	

Comments:

OMB# 2050-0024; Expires 12/31/2014

AWMD / WEMM
MAR 12 2012
RECEIVED

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (MARK ALL BOX(ES) THAT APPLY)

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)
- ☒ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____)
- ☒ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ Site was a TSD facility and/or generator of ≥1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number: I A D 0 7 3 4 8 9 2 8 8

3. Site Name

Name: Industrial Laminates / Norplex Inc.

4. Site Location Information

Street Address: 665 Lybrand St. / PO Box 977
City, Town, or Village: Postville | County: Allamakee
State: IA | Country: USA | Zip Code: 52162

5. Site Land Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

6. NAICS Code(s) for the Site (at least 5-digit codes)

A. 3 2 6 1 3 0 | C. | B. | D.

7. Site Mailing Address

Street or P.O. Box: 665 Lybrand St. / PO Box 977
City, Town, or Village: Postville
State: IA | Country: USA | Zip Code: 52162

8. Site Contact Person

First Name: Jon | MI: B | Last: Thorstenson
Title: Manufacturing Engineer
Street or P.O. Box: 665 Lybrand St. / PO Box 977
City, Town or Village: Postville
State: IA | Country: USA | Zip Code: 52162
Email: jthorstenson@norplex-micarta.com
Phone: 563-864-7321 | Ext.: | Fax: 563-864-4231

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner: Honeywell | Date Became Owner: 1/01/1982
Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other
Street or P.O. Box: 101 Columbia Rd.
City, Town, or Village: Morristown | Phone:
State: NJ | Country: USA | Zip Code: 07962

B. Name of Site's Operator: Industrial Laminates / Norplex Inc. | Date Became Operator: 9/15/1996
Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.

Y ☑ N ☐ **1. Generator of Hazardous Waste**
If "Yes", mark only one of the following – a, b, or c.

- ☑ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; **or** Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; **or** Generates, in any calendar month, **or** accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-4.

Y ☐ N ☑ **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☐ N ☑ **3. United States Importer of Hazardous Waste**

Y ☐ N ☑ **4. Mixed Waste (hazardous and radioactive) Generator**

Y ☐ N ☑ **5. Transporter of Hazardous Waste**
If "Yes", mark all that apply.

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☑ **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

Y ☐ N ☑ **7. Recycler of Hazardous Waste**

Y ☐ N ☑ **8. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☑ **9. Underground Injection Control**

Y ☐ N ☑ **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

Y ☐ N ☑ **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**

- a. Batteries ☐
- b. Pesticides ☐
- c. Mercury containing equipment ☐
- d. Lamps ☐
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☐ N ☑ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☐ N ☑ **1. Used Oil Transporter**
If "Yes", mark all that apply.

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☑ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark all that apply.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☑ **3. Off-Specification Used Oil Burner**

Y ☐ N ☑ **4. Used Oil Fuel Marketer**
If "Yes", mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ❖ You can **ONLY** Opt into Subpart K if:
  - you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
  - you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y ☐ N ☑ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories **See the Item-by-Item Instructions for definitions of types of eligible academic entities. Mark all that apply:**

- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y ☐ N ☑ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D007	D008	D039	F003	F005	

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

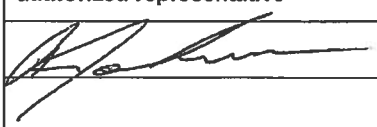
Y [✓] N [ ] Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

This submittal is an amendment to the biennial report dated on February 22, 2012. The changes in this submittal pertain to notification of hazardous secondary material activity. We've been handling HSM as an "in-process" material before running it through a batch distillation unit to reclaim solvents. The attached Hazardous Waste Management Flowchart maps out the routing of hazardous waste and HSM along with instructions for labeling, placarding and container type.

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Alan Johnson / Plant Manager	03/07/2012

EPA ID Number | I | A | D | 0 | 7 | 3 | 4 | 8 | 9 | 2 | 8 | 8 | OMB#: 2050-0024; Expires 12/31/2014

ADDENDUM TO THE SITE IDENTIFICATION FORM:
NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY

ONLY fill out this form if:

- You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See http://www.epa.gov/epawaste/hazard/dsw/statespf.htm for a list of eligible states; **AND**
- You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) **or** you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

1. Indicate reason for notification. Include dates where requested.

☑ Facility will begin managing excluded HSM as of 01/05/2010 (mm/dd/yyyy).

☐ Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.

☐ Facility has stopped managing excluded HSM as of _____ (mm/dd/yyyy) and is notifying as required.

2. Description of excluded HSM activity. Please list the appropriate codes and quantities in **short tons** to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

a. Facility code (answer using codes listed in the Code List section of the instructions)	b. Waste code(s) for HSM	c. Estimated short tons of excluded HSM to be managed annually	d. Actual short tons of excluded HSM that was managed during the most recent odd-numbered year	e. Land-based unit code (answer using codes listed in the Code List section of the instructions)
01	D001, F003 & F005	75 tons	74.4 tons	NA

3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi). (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y☐ N☑ Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?

HAZARDOUS WASTE MANAGEMENT FLOWCHART

CONTAINER #1

CONTAINER #2

UNUSABLE PROCESS MATERIAL

SCRAP CATEGORY

MELAMINE → SELECT CONTAINER 1 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 3 FLAMMABLE PLACARD.

DATE THE LABEL UPON INITIAL ADDITION OF HAZARDOUS WASTE

LABEL / PLACARD: CLASS 3

EPOXY W/ TRIMELLITIC ANHYDRIDE → SELECT CONTAINER 1 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 3 FLAMMABLE PLACARD.

DATE THE LABEL UPON INITIAL ADDITION OF HAZARDOUS WASTE

LABEL: HAZARDOUS WASTE ANHYDRIDE SCRAP; DATE / PLACARD: CLASS 3

PHENOLIC/EPOXY

APPROVED FOR DISTILLATION? (TABLE #1)

NOT APPROVED → SELECT CONTAINER 1 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 3 FLAMMABLE PLACARD.

DATE THE LABEL UPON INITIAL ADDITION OF HAZARDOUS WASTE

LABEL: HAZARDOUS WASTE PHENOLIC/EPOXY SCRAP; DATE / PLACARD: CLASS 3

SCRAP COMPOUNDED RESIN

APPROVED

SCRAP CATEGORY

PHENOLIC WASH → SELECT CONTAINER 1 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 3 FLAMMABLE PLACARD.

DO NOT DATE THE LABEL (NOT HAZARDOUS WASTE YET)

LABEL / PLACARD: CLASS 3

EPOXY WASH → SELECT CONTAINER 1 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 3 FLAMMABLE PLACARD.

DO NOT DATE THE LABEL (NOT HAZARDOUS WASTE YET)

LABEL / PLACARD: CLASS 3

SCRAP RAGS → SELECT CONTAINER 2 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 4 FLAMMABLE SOLIDS PLACARD.

DATE THE LABEL UPON INITIAL ADDITION OF HAZARDOUS WASTE

LABEL: HAZARDOUS WASTE SCRAP RAGS; DATE / PLACARD: CLASS 4

WELL WATER → SELECT CONTAINER 1 OR A PLASTIC IBC AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 3 FLAMMABLE PLACARD.

DATE THE LABEL UPON INITIAL ADDITION OF HAZARDOUS WASTE

LABEL / PLACARD: CLASS 3

TRIMELLITIC ANHYDRIDE FLUFF → SELECT CONTAINER 2 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 4 FLAMMABLE SOLIDS PLACARD.

DATE THE LABEL UPON INITIAL ADDITION OF HAZARDOUS WASTE

LABEL: HAZARDOUS WASTE TMA SCRAP; DATE / PLACARD: CLASS 4

BATCH DISTILLATION → CONDENSATE → WASH SOLVENT

STILL BOTTOMS → SELECT CONTAINER 2 AND APPLY THE FOLLOWING LABEL TO THE CONTAINER ALONG WITH A CLASS 4 FLAMMABLE SOLIDS PLACARD.

DATE THE LABEL UPON INITIAL ADDITION OF HAZARDOUS WASTE

LABEL: HAZARDOUS WASTE STILL BOTTOMS SCRAP; DATE / PLACARD: CLASS 4

TABLE #1: GRADES NOT TO BE RUN THROUGH THE STILL

GRADE DESCRIPTION	PART #
BR25	932404
BR80	932484
MC507U NA CR	931884
MC511AF NA CR	922904
MC511A-RT511 NA CR	922914
MC511SN CR	922964
MC514MG BK CR	932694
MC633CP BK CR	932194
MC844G CR	928474
MC894 CR	934424
MCG10YB BK CR	921934
NP113	912604
NP114	981814
NP130SP WH CR	980084
NP310LS BK CR	309204
NP310LS BN CR	959874
NP310U BK CR	390714
NP310U NA CR	390304
NP312 BK 10 oz 1st Pass & 24oz CR	982684
NP312 BK 10oz 2nd Pass CR	976574
NP313 BK CR	170374
NP315 BK CR	170404
NP315S BK CR	328324
NP323 NA Adhesive for Rubber	170444
NP347 NA CR	170394
NP424 TN Core 2nd Pass CR	170784
NP500CR NA CR	170154
NP500GB BK CR	106484
NP511 MR CR	335704
NP511 NA CR	298094
NP511EM NA CR	397994
NP513 NA CR	990824
NP516	999204
NP517	110834
NP547 CR	410984
NP571 NA CR	998184
NP613 NA CR	345084
NP643 NA CR	103404
NP691 BK CR	170334
NP691 NA CR	170324
NP691K VO CR	326464
NP842 BK Covers CR	430134
NP842 BK CR	170614
SP525M GR CR	915634
SP526M GR CR	984214
RT229 NA CR	218112
RT229 BK CR	218492
RT313 1st Pass CR	100422
RT313 2nd Pass CR	100432
RT315 BK 1st Pass	100482
RT315 BK 2nd Pass	100492
RT507 NA CR	104342
RTB324 BK CR	109702

REPORT ANY ADDITIONAL GRADES NOT INCLUDED ON THIS LIST TO MANUFACTURING ENGINEERING

ADDITIONAL NOTES:
CONTACT MANUFACTURING ENGINEERING IMMEDIATELY IF LABELS, PLACARDS OR CONTAINERS ARE UNAVAILABLE. RUNNING OUT OF THESE MATERIALS IS NOT AN EXCUSE FOR IGNORING INSTRUCTIONS.

DO NOT DATE HAZARDOUS WASTE IN THE APPROVED SATELLITE ACCUMULATION AREAS UNTIL 55 GALLONS IS GENERATED. MOVE THE CONTAINER TO A DESIGNATED 90 DAY STORAGE AREA WITHIN 3 DAYS OF EXCEEDING WASTE LIMITS.

Attachment 7 Page 16 of 17

PST 42-10 Rev. A

ATTACHMENT 10

HAZARDOUS SECONDARY MATERIALS CHECKLIST

(Six Pages)

Section 1: Facility Information

Company Name: INDUSTRIAL LAMINATES / NORPLEX INC.

USEPA ID Number IAD073489288

Facility Type: CESQG _____ SQG _____ LQG ✓
Intermediate _____ Partial Reclamation _____
Commercial Recycling _____

NAICS Code(s) 32613

Company Product and Services LAMINATED SHEETS

Dates of Recent Inspections: 5/17/2007

Do any concerns or violations with recent inspections exist? If so, please attach comments.

Location Address:
Street: 1665 LY BRAND ST
City: POSTVILLE State: IA Zip: 52162

Mailing Address:
Street: SAME
City: _____ State: _____ Zip: _____

Contact Person: JON THORSTENSON
Telephone Number: 563-864-4232
Fax Number: UNKNOWN
Email Address: JTHORSTENSON@NORPLEX-MICARTA.COM

Inspection Date: 5/14/12 Time: From 905 To 1500

Lead Inspector: ~~HEATHER~~ WOOD Telephone No. 816-412-7787

Other People Present (Name, Title, Organization)	Telephone Number
TIM DELANEY PRODUCT DEVELOPMENT ENG	~~816-4~~ (new) 563-864-4232
ALAN JOHNSON PLANT MANAGER	563-864-4232

Section 2: Overview of Manufacturing Process and HSM Characterization

1. Describe the generator's manufacturing/production operations, and identify all of the waste streams (non-product streams) generated from these operations (use extra sheet if needed). If there are multiple production processes or a single complicated production process, process flow diagrams or other diagrams should be obtained to help describe and understand the process to ensure that all production waste streams are identified. (Intermittently generated streams from equipment cleanout will not likely be identified in the diagrams):

SEE FIGURE ATTACHED TO NOTIFICATION

Is the information you have and the generator's explanation of its process sufficient for you to clearly understand the facility's operations and identify what hazardous secondary materials are being generated and recycled? ☑ Y ☐ N

If YES ⇨ Go to Question 2
If NO ⇨ List follow-up questions to ask:

2. Are any of the waste streams listed in Question 1 hazardous secondary materials? ☑ Y ☐ N

If YES ⇨ Go to Question 3
If NO ⇨ **STOP**. RCRA Subtitle C does not apply

3. Are the hazardous secondary materials being generated and subsequently recycled on site or shipped off site for recycling? ☑ Y ☐ N

If YES ⇨ Go to Question 4 and proceed with this checklist.

If NO ⇨ **STOP.** This facility is not recycling a hazardous secondary material and this checklist is not needed. RCRA Subtitle C waste(s) are being generated.

4. For each hazardous secondary material being recycled, what analytical process did the generator use to characterize the hazardous secondary material?

Used knowledge of the manufacturing process and secondary material? ☑ Y ☐ N

Made a determination through proper sampling and analysis of the secondary material? ☐ Y ☑ N

Briefly describe the sampling protocol used:

To the best of your knowledge, is the generator's characterization of its hazardous secondary material correct? ☑ Y ☐ N

4a. Is the facility's HSM being recycled specifically excluded from the definition of solid waste under §261.4(a)(1)–(22)? (See Appendix A for a list of exclusions.) ☐ Y ☑ N

If YES ⇨ **STOP.** These checklists are not applicable. Review the description of the specific exclusion to determine what conditions must be met in order for the HSM to be excluded under DSW.

If NO ⇨ This checklist is applicable for these materials. When you have completed Question 4 for all hazardous secondary materials being recycled, proceed to Section 3a.

Section 3a. Identification and Quantification of HSMs being Generated and Recycled
(Generator Facilities Only)

List HSM that are generated and recycled?

Type of HSMs	RCRA Waste Code(s)	Quantity Generated and Recycled (tons) for Each Waste Code	Is Recycling Occurring On-Site or Off-Site?	If Off-Site, Identify the Type Using Codes Below
Characteristic Byproducts or Sludges				
Commercial Chemical Products				
Scrap metal (other than excluded scrap metal) (See §261.1(c)(9))				
Spent Materials	D001 F003 F005 ONE WASTE STREAM	75 TONS	ONSITE	N/A
Listed Byproducts or Sludges				

1–Off-site facility under the control of the generator
2–Off-site recycling occurring under a tolling agreement
3–Off-site intermediate/consolidation facility followed by recycling at commercial recycling facility
4–Off-site partial reclamation facility[2] followed by recycling at commercial recycling facility
5–Commercial recycling facility
6–Other (please identify)

Note: Please attach additional sheets if insufficient space exists to complete Table 3a.

[2] A partial reclamation facility accepts hazardous secondary metal-bearing materials containing recoverable amounts of copper, chromium, and nickel that they, in turn, de-water and consolidate to produce commodity-like materials that they sell to primary mineral processing facilities for final reclamation.

Checklist 5: Hazardous Secondary Materials (e.g., listed byproducts and sludges and spent materials) Generated and Recycled Under the Control of the Generator (§261.2(a)(2)(ii) and §261.4(a)(23)) (2008 DSW Rule)			
Regulatory Citation	**Condition of Exclusion**	**Comments**	
§261.2(c)(1)(i)(A)&(B)	Are these materials **used in a manner constituting** disposal or once reclaimed, used in a manner constituting disposal? (A) Applied to or placed on the land in a manner that constitutes disposal; or (B) used to produce products that are applied to or placed on the land or are otherwise contained in products that are applied to or placed on the land (in which cases the product itself remains a solid waste)? If yes, then the HSM are solid wastes. Go to §261.6(a)(2)(i) and Part 266, subpart C.		☐ Y ☑ N
§261.2(c)(2)(i)(A)&(B)	Are these materials (A) **burned for energy recovery** or (B) **used to produce a fuel** or otherwise contained in fuels (in which case the fuel itself remains a solid waste), or Once reclaimed, (A) burned for energy recovery; or (B) used to produce a fuel or otherwise contained in fuels (in which case the fuel itself remains a solid waste)? If yes, then the HSM are solid wastes. Go to §261.6(a)(2)(ii) and Part 266, subpart H.		☐ Y ☑ N
§261.2(a)(ii)/§261.4(a)(23)(i)	Is the HSM **contained** in units that control any movement of the hazardous secondary material out of the unit? See Appendix B.		☑ Y ☐ N
§261.2(a)(ii)/§261.4(a)(23)(ii)	Is the HSM generated and reclaimed **under the control of the generator**, as defined in §260.10? Does the generator have signed certifications, as applicable? See Appendix C.	N/A	☑ Y ☐ N ☐ Y ☐ N
§261.2(a)(ii)/§261.4(a)(23)(iii)	Does the generator **maintain records** on the volume of recyclable materials generated per month and the volume recycled per month? Is the hazardous secondary material **speculatively accumulated**, as defined in §261.1(c)(8)? See Appendix D.		☑ Y ☐ N ☐ Y ☑ N
§261.2(a)(ii)/§261.4(a)(23)(iv)	Is the HSM subject to **material-specific management conditions** under paragraph (a) of this section when reclaimed? Is the HSM a spent lead acid battery (see §266.80 and §273.2)? Does the HSM meet the listing description of K171 and K172 in §261.32?		☐ Y ☒ N ☐ Y ☒ N ☐ Y ☒ N
§261.2(a)(ii)/§261.4(a)(23)(v)	Is the reclamation of the HSM **legitimate**, as specified in §260.43? See Appendix E.		☒ Y ☐ N
§261.2(a)(ii)/§261.4(a)(23)(vi)	Has the facility **notified/re-notified** their authorized state or EPA Region that they are taking advantage of this exclusion as required by §260.42? See Appendix G.		☒ Y ☐ N

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Checklist 5: Hazardous Secondary Materials (e.g., listed byproducts and sludges and spent materials) Generated and Recycled Under the Control of the Generator (§261.2(a)(2)(ii) and §261.4(a)(23)) (2008 DSW Rule)			
§262.11	Are any **residuals** generated from the recycling process? Are they characterized correctly? If hazardous wastes, are the materials managed in a manner consistent with all applicable RCRA regulations?		☑ Y ☐ N ☑ Y ☐ N ☑ Y ☐ N
§260.10	Is the generator using a tolling agreement to recycle his HSM? If so, does a written contract exist between the tolling contractor and tolling manufacturer, including reclamation of HSM by the tolling contractor that was generated by the tolling manufacturer as specified in §260.10?		☐ Y ☑ N ☐ Y ☐ N

Note: When generated and recycled under the control of the generator, hazardous secondary materials managed only in non-land-based units are subject to the exclusion at §261.2(a)(2)(ii), whereas hazardous secondary materials that are managed in land-based units during the recycling process are subject to the exclusion at §261.4(a)(23).

Comments:

Bottom Line: Does the facility meet all of the conditions for the exclusion at §261.2(a)(2)(ii) or §261.4(a)(23)?

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ATTACHMENT 11

SOLVENT TRACKING LOG

(Two Pages)

STILL INFORMATION

DATE	BATCH NUMBER	E=EPOXY P=PHENOLIC	TIME ON/OFF	NAME		APPROX GAL RECLAIM
3-28-12	77	P	4:30	DW	DW	10
3-28-12	78	P	8:20	DW	RH	25
3-29-12	79	P	3:00	RH	DW	40
3-29-12	80	E	10:30	DW	DW	45
3-30-12	81	E	5:30	DW	DW	45
4-3-12	82	P	6:10	TM	EH	25
4-4-12	83	P	5:20	EH	DW	25
4-9-12	84	E	5:10	DW	DW	40
4-9-12	85	E	9:35	DW	D.C.	35
4-10-12	86	P	5:30	D.C.	DW	15
4-10-12	87	E	5:25	DW	DW	35
4-10-12	88	E	11:15	DW	D.C.	30
4-12-12	89	E	3:10	D.C.	DW	35
4-12-12	90	E	4:40	DW	DW	40
4-12-12	91	E	10:30	DW	D.C.	40
4-13-12	92	P	5:20	D.C.	DW	15
4-13-12	93	P	4:35	DW	DW	25
4-13-12	94	P	9:10	DW	D.C.	25
4-17-12	95	E	2:00	D.C.	D.C.	35
4-17-12	96	P	7:00	D.C.	DW	30
4-17-12	97	E	10:10	DW	DW	35
4-18-12	98	E	5:40	DW	DW	40
4-18-12	99	E	11:00	DW	DW	30
4-19-12	100	E	6:15	DW	DW	25
4-19-12	101	P	11:00	DW	D.C.	30
4-25-12	102	P	5:00	D.C.	DW	25
4-25-12	103	P	6:45	DW	D.C.	25
4-26-12	104	P	3:15	D.C.	DW	25
4-26-12	105	P	4:15	DW	DW	30
4-26-12	106	P	9:00	DW	D.C.	20
4-27-12	107	E	3:00	D.C.	D.C.	40
4-27-12	108	E	12:30	TM	D.C.	35
5-3-12	109	E	1:30	D.C.	D.C.	40
5-3-12	110	E	6:30	D.C.	DW	25? shoveled
5-7-12	111	E	7:30	DW	D.C.	25
5-8-12	112	P	2:30	D.C.	DW	25
5-8-12	113	P	6:00	DW	DW	25
5-8-12	114	P	11:00	DW	D.C.	35
5-10-12	115	E	3:10	D.C.	DW	40

STILL INFORMATION

DATE	- BATCH NUMBER	E=EPOXY P=PHENOLIC	TIME ON/OFF	NAME	APPROX GAL RECLAIM
5-10-12	#116	E	7:10	DW D.K.	30
5-11-12	#17	P	1:10	DK	

ATTACHMENT 12

WASTE DETERMINATION INFORMATION

(29 Pages)

Material Safety Data Sheet
The Dow Chemical Company

Product Name: D.E.R.* 346 EPOXY RESIN

Issue Date: 11/30/2007
Print Date: 02 Jan 2008

The Dow Chemical Company encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. Product and Company Identification

Product Name
D.E.R.* 346 EPOXY RESIN

COMPANY IDENTIFICATION
The Dow Chemical Company
2030 Willard H. Dow Center
Midland, MI 48674
USA

Customer Information Number: 800-258-2436

EMERGENCY TELEPHONE NUMBER
24-Hour Emergency Contact: 989-636-4400
Local Emergency Contact: 989-636-4400

2. Hazards Identification

Emergency Overview
Color: Yellow
Physical State: Liquid
Odor: Aromatic
Hazards of product:

WARNING! Combustible liquid and vapor. May cause allergic skin reaction. May cause central nervous system effects; may cause respiratory tract irritation. Aspiration hazard. Can enter lungs and cause damage. Isolate area.

OSHA Hazard Communication Standard
This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Potential Health Effects
Eye Contact: Essentially nonirritating to eyes. Vapor may cause eye irritation experienced as mild discomfort and redness.
Skin Contact: Prolonged contact may cause slight skin irritation with local redness.
Skin Absorption: Prolonged skin contact is unlikely to result in absorption of harmful amounts.

Skin Sensitization: Has caused allergic skin reactions in humans.
Inhalation: Excessive exposure to solvent(s) may cause respiratory irritation and central nervous system depression. Symptoms may include headache, dizziness and drowsiness, progressing to incoordination and unconsciousness.
Ingestion: Low toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury. Aspiration into the lungs may occur during ingestion or vomiting, causing lung damage or even death due to chemical pneumonia.
Effects of Repeated Exposure: Solvent has been reported to cause liver, kidney and blood effects at high exposure levels. Xylene is reported to have caused hearing loss in laboratory animals upon exposure to high concentrations; such effects have not been reported in humans.
Cancer Information: Ethylbenzene has been shown to cause cancer in laboratory animals.
Birth Defects/Developmental Effects: Exaggerated doses of xylene given orally to pregnant mice resulted in an increase in cleft palate, a common developmental abnormality in mice. In animal inhalation studies, xylene caused toxicity to the fetus but did not cause birth defects.

3. Composition Information

Component	CAS #	Amount
Propane, 2,2-bis[p-(2,3-epoxypropoxy)phenyl]-, polymers	25085-99-8	> 95.0 %
Xylene	1330-20-7	< 5.0 %
Ethylbenzene	100-41-4	< 1.0 %

4. First-aid measures

Eye Contact: Flush eyes thoroughly with water for several minutes. Remove contact lenses after the initial 1-2 minutes and continue flushing for several additional minutes. If effects occur, consult a physician, preferably an ophthalmologist.
Skin Contact: Remove material from skin immediately by washing with soap and plenty of water. Remove contaminated clothing and shoes while washing. Seek medical attention if irritation persists. Wash clothing before reuse. Discard items which cannot be decontaminated, including leather articles such as shoes, belts and watchbands.
Inhalation: Move person to fresh air. If not breathing, give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask, etc). If breathing is difficult, oxygen should be administered by qualified personnel. Call a physician or transport to a medical facility.
Ingestion: Do not induce vomiting. Call a physician and/or transport to emergency facility immediately.
Notes to Physician: Maintain adequate ventilation and oxygenation of the patient. The decision of whether to induce vomiting or not should be made by a physician. If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. The decision of whether to induce vomiting or not should be made by a physician. Maintain adequate ventilation and oxygenation of the patient. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

5. Fire Fighting Measures

Extinguishing Media: Water fog or fine spray. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. Do not use direct water stream. May spread fire. Alcohol resistant foams (ATC type) are preferred. General purpose synthetic foams (including AFFF) or protein foams may function, but will be less effective. Water fog, applied gently may be used as a blanket for fire extinguishment.

Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Use water spray to cool fire exposed containers and fire affected zone until fire is out and danger of reignition has passed. Fight fire from protected location or safe distance. Consider the use of unmanned hose holders or monitor nozzles. Immediately withdraw all personnel from the area in case of rising sound from venting safety device or discoloration of the container. Do not use direct water stream. May spread fire. Move container from fire area if this is possible without hazard. Burning liquids may be moved by flushing with water to protect personnel and minimize property damage. Water fog, applied gently may be used as a blanket for fire extinguishment. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage. Review the "Accidental Release Measures" and the "Ecological Information" sections of this (M)SDS.
Special Protective Equipment for Firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting clothing with self-contained breathing apparatus. If this is not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.
Unusual Fire and Explosion Hazards: Container may rupture from gas generation in a fire situation. Violent steam generation or eruption may occur upon application of direct water stream to hot liquids. Dense smoke is emitted when burned without sufficient oxygen.
Hazardous Combustion Products: During a fire, smoke may contain the original material in addition to combustion products of varying composition which may be toxic and/or irritating. Combustion products may include and are not limited to: Phenolics. Carbon monoxide. Carbon dioxide.

6. Accidental Release Measures

Steps to be Taken If Material is Released or Spilled: Contain spilled material if possible. Absorb with materials such as: Sand. Polypropylene fiber products. Polyethylene fiber products. Use non-sparking tools in cleanup operations. Ground and bond all containers and handling equipment. Collect in suitable and properly labeled containers. Pump with explosion-proof equipment. If available, use foam to smother or suppress. Remove residual with soap and hot water. Residual can be removed with solvent. Solvents are not recommended for clean-up unless the recommended exposure guidelines and safe handling practices for the specific solvent are followed. Consult appropriate solvent Safety Data Sheet for handling information and exposure guidelines. See Section 13, Disposal Considerations, for additional information.
Personal Precautions: Isolate area. Keep upwind of spill. Keep unnecessary and unprotected personnel from entering the area. Keep personnel out of low areas. Ventilate area of leak or spill. No smoking in area. Eliminate all sources of ignition in vicinity of spill or released vapor to avoid fire or explosion. For large spills, warn public of downwind explosion hazard. Check area with combustible gas detector before reentering area. Ground and bond all containers and handling equipment. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection. Refer to Section 7, Handling, for additional precautionary measures.
Environmental Precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

7. Handling and Storage

Handling
General Handling: Keep away from heat, sparks and flame. Avoid prolonged or repeated contact with skin. Avoid breathing vapor. Do not swallow. Keep container closed. Use with adequate ventilation. Wash thoroughly after handling. Never use air pressure for transferring product. No smoking, open flames or sources of ignition in handling and storage area. Electrically bond and ground all containers and equipment before transfer or use of material. Containers, even those that have been emptied, can contain vapors. Do not cut, drill, grind, weld, or perform similar operations on or near empty containers. Use of non-sparking or explosion-proof equipment may be necessary, depending upon the type of operation. See Section 8, EXPOSURE CONTROLS AND PERSONAL PROTECTION.

Storage

Minimize sources of ignition, such as static build-up, heat, spark or flame.

Shelf life: Use within	Storage temperature:
3 Months	2 - 43 °C

8. Exposure Controls / Personal Protection

Exposure Limits

Component	List	Type	Value
Xylene	ACGIH	TWA	100 ppm BEI
	ACGIH	STEL	150 ppm BEI
	OSHA Table Z-1	PEL	435 mg/m3 100 ppm
Ethylbenzene	ACGIH	TWA	100 ppm BEI
	ACGIH	STEL	125 ppm BEI
	OSHA Table Z-1	PEL	435 mg/m3 100 ppm

A BEI notation following the exposure guideline refers to a guidance value for assessing biological monitoring results as an indicator of the uptake of a substance from all routes of exposures.

Personal Protection

Eye/Face Protection: Use safety glasses. If exposure causes eye discomfort, use a full-face respirator.

Skin Protection: Use protective clothing chemically resistant to this material. Selection of specific items such as face shield, boots, apron, or full body suit will depend on the task. Remove contaminated clothing immediately, wash skin area with soap and water, and launder clothing before reuse or dispose of properly. Items which cannot be decontaminated, such as shoes, belts and watchbands, should be removed and disposed of properly.

Hand protection: Use gloves chemically resistant to this material. Examples of preferred glove barrier materials include: Butyl rubber. Ethyl vinyl alcohol laminate ("EVAL"). Neoprene. Nitrile/butadiene rubber ("nitrile" or "NBR"). Polyvinyl chloride ("PVC" or "vinyl"). NOTICE: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all relevant workplace factors such as, but not limited to: Other chemicals which may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), potential body reactions to glove materials, as well as the instructions/specifications provided by the glove supplier.

Respiratory Protection: Respiratory protection should be worn when there is a potential to exceed the exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. For emergency conditions, use an approved positive-pressure self-contained breathing apparatus. The following should be effective types of air-purifying respirators: Organic vapor cartridge.

Ingestion: Avoid ingestion of even very small amounts; do not consume or store food or tobacco in the work area; wash hands and face before smoking or eating.

Engineering Controls

Ventilation: Use local exhaust ventilation, or other engineering controls to maintain airborne levels below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, general ventilation should be sufficient for most operations. Local exhaust ventilation may be necessary for some operations.

9. Physical and Chemical Properties

Physical State	Liquid
Color	Yellow
Odor	Aromatic
Flash Point - Closed Cup	59 °C (138 °F) *Pensky-Martens Closed Cup ASTM D 93*
Flammable Limits in Air	**Lower:** 1 %(V) *Literature*
	Upper: 7 %(V) *Literature*
Autoignition Temperature	572 °C (1,062 °F) *Literature*
Vapor Pressure	8.82 mmHg @ 25 °C *Literature*
Boiling Point (760 mmHg)	No test data available.
Vapor Density (air = 1)	No test data available
Specific Gravity (H2O = 1)	1.15 *Literature*
Freezing Point	No test data available
Melting Point	Not applicable
Solubility in Water (by weight)	Insoluble
pH	No test data available
Dynamic Viscosity	2,000 - 5,000 cPs @ 25 °C *ASTM D445*

10. Stability and Reactivity

Stability/Instability

Stable under recommended storage conditions. See Storage, Section 7.
Conditions to Avoid: Avoid temperatures above 300 °C (572 °F). Potentially violent decomposition can occur above 350 °C (662 °F). Generation of gas during decomposition can cause pressure in closed systems. Pressure build-up can be rapid.

Incompatible Materials: Avoid contact with oxidizing materials. Avoid contact with: Acids. Bases. Avoid unintended contact with amines.

Hazardous Polymerization

Will not occur by itself. Masses of more than one pound (0.5 kg) of product plus an aliphatic amine will cause irreversible polymerization with considerable heat build-up.

Thermal Decomposition

Decomposition products depend upon temperature, air supply and the presence of other materials. Gases are released during decomposition. Uncontrolled exothermic reaction of epoxy resins release phenolics, carbon monoxide, and water.

11. Toxicological Information

Acute Toxicity

Ingestion
LD50, Rat > 2,000 mg/kg
Skin Absorption
LD50, Rabbit > 2,000 mg/kg
Sensitization
Skin
Has caused allergic skin reactions in humans.
Repeated Dose Toxicity
Solvent has been reported to cause liver, kidney and blood effects at high exposure levels. Xylene is reported to have caused hearing loss in laboratory animals upon exposure to high concentrations; such effects have not been reported in humans.
Chronic Toxicity and Carcinogenicity
Ethylbenzene has been shown to cause cancer in laboratory animals. Xylene was not found to be carcinogenic in a National Toxicology Program bioassay in rats and mice. Many studies have been conducted to assess the potential carcinogenicity of diglycidyl ether of bisphenol A (DGEBPA). Indeed,

the most recent review of the available data by the International Agency for Research on Cancer (IARC) has concluded that DGEBPA is not classified as a carcinogen. Although some weak evidence of carcinogenicity has been reported in animals, when all of the data are considered, the weight of evidence does not show that DGEBPA is carcinogenic.

Carcinogenicity Classifications:

Component	List	Classification
Ethylbenzene	IARC	Possible carcinogen.; 2B

Developmental Toxicity

Exaggerated doses of xylene given orally to pregnant mice resulted in an increase in cleft palate, a common developmental abnormality in mice. In animal inhalation studies, xylene caused toxicity to the fetus but did not cause birth defects. Resins based on the diglycidyl ether of bisphenol A (DGEBPA) did not cause birth defects or other adverse effects on the fetus when pregnant rabbits were exposed by skin contact, the most likely route of exposure, or when pregnant rats or rabbits were exposed orally.

Reproductive Toxicity

Contains component(s) which did not interfere with reproduction in animal studies.

Genetic Toxicology

Results of in vitro and animal genetic toxicity tests on xylene have been negative. Animal genetic toxicity tests for resins based on diglycidyl ether of bisphenol A (DGEBPA) have been negative while in vitro studies have shown mixed results.

12. Ecological Information

CHEMICAL FATE

Data for Component: **Propane, 2,2-bis[p-(2,3-epoxypropoxy)phenyl]-, polymers**

Movement & Partitioning

Bioconcentration potential is moderate (BCF between 100 and 3000 or Log Pow between 3 and 5). Potential for mobility in soil is low (Koc between 500 and 2000). Given its very low Henry's constant, volatilization from natural bodies of water or moist soil is not expected to be an important fate process.

Henry's Law Constant (H): <= 6.94E-09 atm*m3/mole; 25 °C Estimated
Partition coefficient, n-octanol/water (log Pow): 3.7 - 3.9 Measured
Partition coefficient, soil organic carbon/water (Koc): 1,800 - 4,400 Estimated

Persistence and Degradability

Biodegradation under aerobic laboratory conditions is below detectable limits (BOD20 or BOD28/ThOD < 2.5%).
Based on stringent OECD test guidelines, this material cannot be considered as readily biodegradable; however, these results do not necessarily mean that the material is not biodegradable under environmental conditions.

Indirect Photodegradation with OH Radicals

Rate Constant	Atmospheric Half-life	Method
6.69E-11 cm3/s	1.92 h	Estimated

OECD Biodegradation Tests:

Biodegradation	Exposure Time	Method
12 %	28 d	OECD 302B Test

Biological oxygen demand (BOD):

BOD 5	BOD 10	BOD 20	BOD 28
		< 2.5 %	

Theoretical Oxygen Demand: 2.35 mg/mg

Data for Component: **Xylene**

Movement & Partitioning

Bioconcentration potential is low (BCF less than 100 or log Pow less than 3). Potential for mobility in soil is medium (Koc between 150 and 500).

Henry's Law Constant (H): 7.45E-3 atm*m3/mole; 25 °C Estimated
Partition coefficient, n-octanol/water (log Pow): 3.12 Measured
Partition coefficient, soil organic carbon/water (Koc): 443 Estimated

Bioconcentration Factor (BCF): 15 - 21; fish; Measured

Persistence and Degradability

Material is expected to be readily biodegradable.

Indirect Photodegradation with OH Radicals

Rate Constant	Atmospheric Half-life	Method
6.5E-12 cm3/s	19.7 h	Estimated

Biological oxygen demand (BOD):

BOD 5	BOD 10	BOD 20	BOD 28
37 %	58 %	72 %	

Theoretical Oxygen Demand: 3.17 mg/mg

Data for Component: **Ethylbenzene**

Movement & Partitioning

Bioconcentration potential is low (BCF less than 100 or log Pow less than 3). Potential for mobility in soil is low (Koc between 500 and 2000).
Henry's Law Constant (H): 8.44E-3 atm*m3/mole; 25 °C Measured
Partition coefficient, n-octanol/water (log Pow): 3.15 Measured
Partition coefficient, soil organic carbon/water (Koc): 518 Estimated
Bioconcentration Factor (BCF): 15; fish; Measured

Persistence and Degradability

Material is readily biodegradable. Passes OECD test(s) for ready biodegradability.

Indirect Photodegradation with OH Radicals

Rate Constant	Atmospheric Half-life	Method
7.1E-12 cm3/s	55 h	Estimated

OECD Biodegradation Tests:

Biodegradation	Exposure Time	Method
100 %	6 d	OECD 301E Test

Biological oxygen demand (BOD):

BOD 5	BOD 10	BOD 20	BOD 28
31.5 %	38.5 %	45.4 %	

Chemical Oxygen Demand: 2.62 mg/mg
Theoretical Oxygen Demand: 3.17 mg/mg

ECOTOXICITY

Data for Component: **Propane, 2,2-bis[p-(2,3-epoxypropoxy)phenyl]-, polymers**

Material is moderately toxic to aquatic organisms on an acute basis (LC50/EC50 between 1 and 10 mg/L in most sensitive species tested). Toxicity to aquatic species occurs at concentrations above material's water solubility.

Fish Acute & Prolonged Toxicity

LC50, fathead minnow (Pimephales promelas), 96 h: 3.1 mg/l

Aquatic Invertebrate Acute Toxicity

EC50, water flea Daphnia magna, 48 h, immobilization: 1.4 - 1.7 mg/l

Toxicity to Micro-organisms

IC50; bacteria, Growth inhibition, 18 h: > 42.6 mg/l

Data for Component: **Xylene**

Material is moderately toxic to aquatic organisms on an acute basis (LC50/EC50 between 1 and 10 mg/L in most sensitive species tested).

Fish Acute & Prolonged Toxicity

LC50, rainbow trout (Oncorhynchus mykiss), 96 h: 9.2 mg/l

Aquatic Invertebrate Acute Toxicity

LC50, water flea Daphnia magna, 48 h: 14.3 mg/l

Aquatic Plant Toxicity

EC50, green alga Selenastrum capricornutum, biomass growth inhibition, 72 h: 3.2 - 4.9 mg/l

Data for Component: **Ethylbenzene**

Material is moderately toxic to aquatic organisms on an acute basis (LC50/EC50 between 1 and 10 mg/L in most sensitive species tested).

Fish Acute & Prolonged Toxicity
LC50, bluegill (Lepomis macrochirus): 32 - 285 mg/l
LC50, rainbow trout (Oncorhynchus mykiss), 96 h: 14 mg/l
LC50, striped bass (Morone saxatilis): 3.7 mg/l
Aquatic Invertebrate Acute Toxicity
EC50, water flea Daphnia magna, 48 h, immobilization: 2.2 mg/l
LC50, water flea Daphnia magna, flow-through, 2 d, survival: 13.9 - 75 mg/l
Aquatic Plant Toxicity
EC50, green alga Selenastrum capricornutum, Growth inhibition (cell density reduction), 72 h: 3.6 - 4.6 mg/l
Toxicity to Micro-organisms
EC50; bacteria, Growth Inhibition, 16 h: > 12 mg/l
Toxicity to Soil Dwelling Organisms
LC50, Earthworm Eisenia foetida, adult, 2 d: 0.047 mg/cm2

13. Disposal Considerations

DO NOT DUMP INTO ANY SEWERS, ON THE GROUND, OR INTO ANY BODY OF WATER. All disposal practices must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator. DOW HAS NO CONTROL OVER THE MANAGEMENT PRACTICES OR MANUFACTURING PROCESSES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN MSDS SECTION: Composition Information. FOR UNUSED & UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted: Incinerator or other thermal destruction device. As a service to its customers, Dow can provide names of information resources to help identify waste management companies and other facilities which recycle, reprocess or manage chemicals or plastics, and that manage used drums. Telephone Dow's Customer Information Group at 1-800-258-2436 or 1-989-832-1556 (U.S.), or 1-800-331-6451 (Canada) for further details.

14. Transport Information

DOT Non-Bulk
NOT REGULATED

DOT Bulk
Proper Shipping Name: RESIN SOLUTION
Hazard Class: 3 **ID Number:** UN1866 **Packing Group:** PG III

IMDG
Proper Shipping Name: RESIN SOLUTION
Hazard Class: 3 **ID Number:** UN1866 **Packing Group:** PG III
EMS Number: F-E,S-E
Marine pollutant.: No

ICAO/IATA
Proper Shipping Name: RESIN SOLUTION
Hazard Class: 3 **ID Number:** UN1866 **Packing Group:** PG III
Cargo Packing Instruction: 310
Passenger Packing Instruction: 309

Additional Information

Reportable quantity: 2,000 lb – XYLENE

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

15. Regulatory Information

OSHA Hazard Communication Standard
This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312

Immediate (Acute) Health Hazard	Yes
Delayed (Chronic) Health Hazard	Yes
Fire Hazard	Yes
Reactive Hazard	No
Sudden Release of Pressure Hazard	No

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313
This product contains the following substances which are subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and which are listed in 40 CFR 372.

Component	CAS #	Amount
Xylene	1330-20-7	< 5.0 %
Ethylbenzene	100-41-4	< 1.0 %

Pennsylvania (Worker and Community Right-To-Know Act): Pennsylvania Hazardous Substances List and/or Pennsylvania Environmental Hazardous Substance List:
The following product components are cited in the Pennsylvania Hazardous Substance List and/or the Pennsylvania Environmental Substance List, and are present at levels which require reporting.

Component	CAS #	Amount
Xylene	1330-20-7	< 5.0 %

Pennsylvania (Worker and Community Right-To-Know Act): Pennsylvania Special Hazardous Substances List:
To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)
WARNING: This product contains a chemical(s) known to the State of California to cause cancer.

Component	CAS #	Amount
Ethylbenzene	100-41-4	< 1.0 %

European Inventory of Existing Commercial Chemical Substances (EINECS)
Components of this product are not listed on EINECS because they are polymers or "no-longer polymers" marketed before the enforcement of the 7th Amendment to Directive 67/548/EEC.

US. Toxic Substances Control Act
All components of this product are on the TSCA Inventory or are exempt from TSCA Inventory requirements under 40 CFR 720.30

CEPA - Domestic Substances List (DSL)
All substances contained in this product are listed on the Canadian Domestic Substances List (DSL) or are not required to be listed.

Remarks:

Liquid Epoxy Resins (LERs) are made by reacting bisphenol A and epichlorohydrin. Dow uses both CAS No. 25085-99-8 and 25068-38-6 for its LERs. Other manufacturers use CAS No. 25068-38-6 for their LERs. Accordingly, LER manufacturers consider that derivatives of LERs may be described using either CAS number as a starting material.

16. Other Information

Recommended Uses and Restrictions
Used in applications such as: Composites.

Revision
Identification Number: 79640 / 1001 / Issue Date 11/30/2007 / Version: 2.0
Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

N/A	Not available
W/W	Weight/Weight
OEL	Occupational Exposure Limit
STEL	Short Term Exposure Limit
TWA	Time Weighted Average
ACGIH	American Conference of Governmental Industrial Hygienists, Inc.
DOW IHG	Dow Industrial Hygiene Guideline
WEEL	Workplace Environmental Exposure Level
HAZ_DES	Hazard Designation
Action Level	A value set by OSHA that is lower than the PEL which will trigger the need for activities such as exposure monitoring and medical surveillance if exceeded.

Material Safety Data Sheet
The Dow Chemical Company

Product Name: XU 71881.00L Experimental Epoxy Resin

Issue Date: 05/14/2007
Print Date: 24 Sep 2010

The Dow Chemical Company encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. Product and Company Identification

Product Name
XU 71881.00L Experimental Epoxy Resin

COMPANY IDENTIFICATION
The Dow Chemical Company
2030 Willard H. Dow Center
Midland, MI 48674
USA

Customer Information Number: 800-258-2436

EMERGENCY TELEPHONE NUMBER
24-Hour Emergency Contact: 989-636-4400
Local Emergency Contact: 989-636-4400

2. Hazards Identification

Emergency Overview
Color: Yellow
Physical State: Liquid
Odor: Acetone.
Hazards of product:

DANGER! Extremely flammable liquid and vapor - Vapor may cause flash fire. May cause allergic skin reaction. May cause anesthetic effects. May cause central nervous system effects; may cause respiratory tract irritation. Aspiration hazard. Can enter lungs and cause damage. Vapor explosion hazard. Vapors may travel a long distance; ignition and/or flash back may occur. Stay out of low areas. Keep upwind of spill. Evacuate area. Warn public of downwind explosion hazard. Eliminate ignition sources. Toxic fumes may be released in fire situations.

OSHA Hazard Communication Standard
This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Potential Health Effects
Eye Contact: Essentially nonirritating to eyes. Vapor may cause eye irritation experienced as mild discomfort and redness.
Skin Contact: Prolonged exposure not likely to cause significant skin irritation.
Skin Absorption: Prolonged skin contact is unlikely to result in absorption of harmful amounts.
Skin Sensitization: Skin contact may cause an allergic skin reaction.
Inhalation: Excessive exposure to solvent(s) may cause respiratory irritation and central nervous system depression. Symptoms may include headache, dizziness and drowsiness, progressing to incoordination and unconsciousness.
Ingestion: Low toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury. Aspiration into the lungs may occur during ingestion or vomiting, causing lung damage or even death due to chemical pneumonia.
Effects of Repeated Exposure: Symptoms of excessive exposure may be anesthetic or narcotic effects; dizziness and drowsiness may be observed. Contains component(s) which have been reported to cause effects on the following organs in animals: The component(s) is/are: Acetone. Kidney. Liver. Blood. Development of cataracts has been reported in laboratory animals after prolonged repeated skin exposure to acetone.
Birth Defects/Developmental Effects: Contains component(s) which did not cause birth defects in animals; other fetal effects occurred only at doses toxic to the mother. The component(s) is/are: Acetone.

3. Composition Information

Component	CAS #	Amount
Bisphenol A, epichlorohydrin and tetrabromobisphenol A polymer	26265-08-7	75.0 - 80.0 %
Acetone	67-64-1	20.0 - 25.0 %

4. First-aid measures

Eye Contact: Flush eyes thoroughly with water for several minutes. Remove contact lenses after the initial 1-2 minutes and continue flushing for several additional minutes. If effects occur, consult a physician, preferably an ophthalmologist.
Skin Contact: Remove material from skin immediately by washing with soap and plenty of water. Remove contaminated clothing and shoes while washing. Seek medical attention if irritation persists. Wash clothing before reuse. Discard items which cannot be decontaminated, including leather articles such as shoes, belts and watchbands.
Inhalation: Move person to fresh air. If not breathing, give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask, etc). If breathing is difficult, oxygen should be administered by qualified personnel. Call a physician or transport to a medical facility.
Ingestion: Do not induce vomiting. Call a physician and/or transport to emergency facility immediately.
Notes to Physician: The decision of whether to induce vomiting or not should be made by a physician. If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. Maintain adequate ventilation and oxygenation of the patient. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

5. Fire Fighting Measures

Extinguishing Media: Water fog or fine spray. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. Do not use direct water stream. Straight or direct water streams may not be effective to extinguish fire. Alcohol resistant foams (ATC type) are preferred. General purpose synthetic foams (including AFFF) or protein foams may function, but will be less effective.

Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Stay upwind. Keep out of low areas where gases (fumes) can accumulate. Water may not be effective in extinguishing fire. Use water spray to cool fire exposed containers and fire affected zone until fire is out and danger of reignition has passed. Fight fire from protected location or safe distance. Consider the use of unmanned hose holders or monitor nozzles. Immediately withdraw all personnel from the area in case of rising sound from venting safety device or discoloration of the container. Do not use direct water stream. May spread fire. Eliminate ignition sources. Move container from fire area if this is possible without hazard. Burning liquids may be moved by flushing with water to protect personnel and minimize property damage.
Special Protective Equipment for Firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting clothing with self-contained breathing apparatus. If this is not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.
Unusual Fire and Explosion Hazards: Container may rupture from gas generation in a fire situation. Electrically ground and bond all equipment. Flammable mixtures of this product are readily ignited even by static discharge. Vapors are heavier than air and may travel a long distance and accumulate in low lying areas. Ignition and/or flash back may occur. Flammable mixtures may exist within the vapor space of containers at room temperature. Flammable concentrations of vapor can accumulate at temperatures above flash point; see Section 9. Dense smoke is emitted when burned without sufficient oxygen.
Hazardous Combustion Products: During a fire, smoke may contain the original material in addition to combustion products of varying composition which may be toxic and/or irritating. Combustion products may include and are not limited to: Phenolic compounds. Hydrogen bromide. Carbon monoxide. Carbon dioxide.

6. Accidental Release Measures

Steps to be Taken if Material is Released or Spilled: Pump with explosion-proof equipment. If available, use foam to smother or suppress. Contain spilled material if possible. Absorb with materials such as: Sand. Polypropylene fiber products. Polyethylene fiber products. Collect in suitable and properly labeled containers. Remove residual with soap and hot water. Residual can be removed with solvent. Solvents are not recommended for clean-up unless the recommended exposure guidelines and safe handling practices for the specific solvent are followed. Consult appropriate solvent Safety Data Sheet for handling information and exposure guidelines. See Section 13, Disposal Considerations, for additional information.
Personal Precautions: Evacuate area. Only trained and properly protected personnel must be involved in clean-up operations. Keep personnel out of low areas. Keep upwind of spill. Ventilate area of leak or spill. No smoking in area. Eliminate all sources of ignition in vicinity of spill or released vapor to avoid fire or explosion. Vapor explosion hazard. Keep out of sewers. For large spills, warn public of downwind explosion hazard. Check area with combustible gas detector before reentering area. Ground and bond all containers and handling equipment. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection. Refer to Section 7, Handling, for additional precautionary measures.
Environmental Precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

7. Handling and Storage

Handling
General Handling: Keep away from heat, sparks and flame. Keep container closed. Avoid prolonged or repeated contact with skin. Avoid breathing vapor. Use with adequate ventilation. Do not swallow. Wash thoroughly after handling. Never use air pressure for transferring product. No smoking, open flames or sources of ignition in handling and storage area. Vapors are heavier than air and may travel a long distance and accumulate in low lying areas. Ignition and/or flash back may occur. Electrically

bond and ground all containers and equipment before transfer or use of material. Containers, even those that have been emptied, can contain vapors. Do not cut, drill, grind, weld, or perform similar operations on or near empty containers. Use of non-sparking or explosion-proof equipment may be necessary, depending upon the type of operation. See Section 8, EXPOSURE CONTROLS AND PERSONAL PROTECTION.

Storage

Flammable mixtures may exist within the vapor space of containers at room temperature. Minimize sources of ignition, such as static build-up, heat, spark or flame. Keep container closed.

Shelf life: Use within	**Storage temperature:**
12 Months	2 - 43 °C

8. Exposure Controls / Personal Protection

Exposure Limits

Component	List	Type	Value
Acetone	ACGIH	TWA	500 ppm
	ACGIH	STEL	750 ppm
	OSHA Table Z-1	PEL	2,400 mg/m3 1,000 ppm

Personal Protection

Eye/Face Protection: Use safety glasses. If exposure causes eye discomfort, use a full-face respirator.

Skin Protection: Use protective clothing chemically resistant to this material. Selection of specific items such as face shield, boots, apron, or full body suit will depend on the task. Remove contaminated clothing immediately, wash skin area with soap and water, and launder clothing before reuse or dispose of properly. Items which cannot be decontaminated, such as shoes, belts and watchbands, should be removed and disposed of properly.

Hand protection: Use gloves chemically resistant to this material. Examples of preferred glove barrier materials include: Butyl rubber. Polyethylene. Neoprene. Natural rubber ("latex"). Ethyl vinyl alcohol laminate ("EVAL"). Examples of acceptable glove barrier materials include: Chlorinated polyethylene. Polyvinyl chloride ("PVC" or "vinyl"). Nitrile/butadiene rubber ("nitrile" or "NBR"). Polyvinyl alcohol ("PVA"). NOTICE: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all relevant workplace factors such as, but not limited to: Other chemicals which may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), potential body reactions to glove materials, as well as the instructions/specifications provided by the glove supplier.

Respiratory Protection: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required, use an approved air-purifying or positive-pressure supplied-air respirator depending on the potential airborne concentration. For emergency conditions, use an approved positive-pressure self-contained breathing apparatus. The following should be effective types of air-purifying respirators: Organic vapor cartridge.

Ingestion: Avoid ingestion of even very small amounts; do not consume or store food or tobacco in the work area; wash hands and face before smoking or eating.

Engineering Controls

Ventilation: Provide general and/or local exhaust ventilation to control airborne levels below the exposure guidelines.

9. Physical and Chemical Properties

Physical State	Liquid
Color	Yellow

Odor	Acetone.
Flash Point - Closed Cup	-20 °C (-4 °F) *Tag Closed Cup ASTM D56* Acetone
Flammable Limits In Air	**Lower**: 2.5 %(V) *Literature* Acetone
	Upper: 13.0 %(V) *Literature* Acetone
Autoignition Temperature	Not determined
Vapor Pressure	181.7 mmHg @ 20 °C *Literature* Acetone
Boiling Point (760 mmHg)	56 °C (133 °F) *Literature* Acetone.
Vapor Density (air = 1)	2.00 *Literature* Acetone
Specific Gravity (H2O = 1)	1.18 - 1.22 *Literature*
Liquid Density	9.90 - 10.10 g/cm3 @ 25 °C *ASTM D1963*
Freezing Point	Not determined
Melting Point	Not applicable
Solubility in Water (by weight)	Mild
pH	Not determined
Dynamic Viscosity	1,500 - 2,500 cPs @ 25 °C *ASTM D445*

10. Stability and Reactivity

Stability/Instability
Stable under recommended storage conditions. See Storage, Section 7.
Conditions to Avoid: Avoid temperatures above 200°C (392°F) Potentially violent decomposition can occur above 250°C (482°F) Generation of gas during decomposition can cause pressure in closed systems. Pressure build-up can be rapid. Avoid static discharge.

Incompatible Materials: Avoid contact with oxidizing materials. Avoid contact with: Acids. Bases. Avoid unintended contact with amines.

Hazardous Polymerization
Will not occur by itself. Masses of more than one pound (0.5 kg) of product plus an aliphatic amine will cause irreversible polymerization with considerable heat build-up.

Thermal Decomposition
Toxic gases are released during decomposition. Uncontrolled exothermic reaction of brominated epoxy resins release phenolics, carbon monoxide, hydrogen bromide, and water

11. Toxicological Information

Acute Toxicity
Ingestion
LD50, Rat > 4,000 mg/kg
Skin Absorption
LD50, Rabbit > 2,000 mg/kg
Sensitization
Skin
Skin contact may cause an allergic skin reaction.
Repeated Dose Toxicity
Symptoms of excessive exposure may be anesthetic or narcotic effects; dizziness and drowsiness may be observed. Contains component(s) which have been reported to cause effects on the following organs in animals: The component(s) is/are: Acetone. Kidney. Liver. Blood. Development of cataracts has been reported in laboratory animals after prolonged repeated skin exposure to acetone.
Chronic Toxicity and Carcinogenicity
Acetone did not cause cancer in long-term animal studies.
Developmental Toxicity
Contains component(s) which did not cause birth defects in animals; other fetal effects occurred only at doses toxic to the mother. The component(s) is/are: Acetone.

Reproductive Toxicity
Contains component(s) which did not interfere with reproduction in animal studies. The component(s) is/are: Acetone.

Genetic Toxicology
For the solvent(s): In vitro genetic toxicity studies were negative in some cases and positive in other cases.

12. Ecological Information

CHEMICAL FATE

Movement & Partitioning
For the solvent(s): Bioconcentration potential is low (BCF less than 100 or log Pow less than 3). Potential for mobility in soil is very high (Koc between 0 and 50).

Persistence and Degradability
Based largely or completely on data for polymeric component: Based on stringent OECD test guidelines, this material cannot be considered as readily biodegradable; however, these results do not necessarily mean that the material is not biodegradable under environmental conditions. For the solvent(s): Material is readily biodegradable. Passes OECD test(s) for ready biodegradability.

ECOTOXICITY
For the solvent(s): Material is practically non-toxic to aquatic organisms on an acute basis (LC50/EC50 >100 mg/L in the most sensitive species tested).

13. Disposal Considerations

DO NOT DUMP INTO ANY SEWERS, ON THE GROUND, OR INTO ANY BODY OF WATER. All disposal practices must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator. DOW HAS NO CONTROL OVER THE MANAGEMENT PRACTICES OR MANUFACTURING PROCESSES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN MSDS SECTION: Composition Information. FOR UNUSED & UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted: Incinerator or other thermal destruction device. As a service to its customers, Dow can provide names of information resources to help identify waste management companies and other facilities which recycle, reprocess or manage chemicals or plastics, and that manage used drums. Telephone Dow's Customer Information Group at 1-800-258-2436 or 1-989-832-1556 (U.S.), or 1-800-331-6451 (Canada) for further details.

14. Transport Information

DOT Non-Bulk
Proper Shipping Name: RESIN SOLUTION
Hazard Class: 3 **ID Number:** UN1866 **Packing Group:** PG II

DOT Bulk
Proper Shipping Name: RESIN SOLUTION
Hazard Class: 3 **ID Number:** UN1866 **Packing Group:** PG II

IMDG
Proper Shipping Name: RESIN SOLUTION
Hazard Class: 3 **ID Number:** UN1866 **Packing Group:** PG II

EMS Number: F-E,S-E
Marine pollutant.: No

ICAO/IATA
Proper Shipping Name: RESIN SOLUTION
Hazard Class: 3 **ID Number:** UN1866 **Packing Group:** PG II
Cargo Packing Instruction: 307
Passenger Packing Instruction: 305

Additional Information

Reportable quantity: 20,000 lb – ACETONE

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

15. Regulatory Information

OSHA Hazard Communication Standard
This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312

Immediate (Acute) Health Hazard	Yes
Delayed (Chronic) Health Hazard	Yes
Fire Hazard	Yes
Reactive Hazard	No
Sudden Release of Pressure Hazard	No

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313
To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

Pennsylvania (Worker and Community Right-To-Know Act): Pennsylvania Hazardous Substances List and/or Pennsylvania Environmental Hazardous Substance List:
The following product components are cited in the Pennsylvania Hazardous Substance List and/or the Pennsylvania Environmental Substance List, and are present at levels which require reporting.

Component	CAS #	Amount
Acetone	67-64-1	20.0 - 25.0 %

Pennsylvania (Worker and Community Right-To-Know Act): Pennsylvania Special Hazardous Substances List:
To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)
This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

US. Toxic Substances Control Act
All components of this product are on the TSCA Inventory or are exempt from TSCA Inventory requirements under 40 CFR 720.30
European Inventory of Existing Commercial Chemical Substances (EINECS)

The components of this product are on the EINECS inventory or are exempt from inventory requirements.

CEPA - Domestic Substances List (DSL)

All substances contained in this product are listed on the Canadian Domestic Substances List (DSL) or are not required to be listed.

16. Other Information

Hazard Rating System

NFPA	Health	Fire	Reactivity
	1	3	1

Recommended Uses and Restrictions

Used in applications such as: Electrical laminate for printed wire board manufacturing.

Revision

Identification Number: 80136 / 1001 / Issue Date 05/14/2007 / Version: 2.1

Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

N/A	Not available
W/W	Weight/Weight
OEL	Occupational Exposure Limit
STEL	Short Term Exposure Limit
TWA	Time Weighted Average
ACGIH	American Conference of Governmental Industrial Hygienists, Inc.
DOW IHG	Dow Industrial Hygiene Guideline
WEEL	Workplace Environmental Exposure Level
HAZ_DES	Hazard Designation
Action Level	A value set by OSHA that is lower than the PEL which will trigger the need for activities such as exposure monitoring and medical surveillance if exceeded.

The Dow Chemical Company urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ between various locations. It is the buyer's/user's responsibility to ensure that his activities comply with all federal, state, provincial or local laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of sources for information such as manufacturer-specific (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.

HEXION
Specialty Chemicals

Material Safety Data Sheet

EPON™ Resin 1124-A-80

1. Product and company identification

Product name	EPON™ Resin 1124-A-80
MSDS Number	800478
Internal code	K2135
Product Type	Brominated resin solution
Manufacturer, Importer, Supplier	Hexion Specialty Chemicals, Inc. P. O. Box 4500 Houston TX 77210 hazcom@hexion.com
Print date	23-MAR-2010
Telephone	**For Emergency Medical Assistance** Call Health & Safety Information Services, 1-866-303-6949 **For Emergency Transportation Information** CHEMTREC US Domestic (800) 424-9300 CHEMTREC International (703) 527-3887 CANUTEC CA Domestic (613) 996-6666 For additional health and safety or regulatory information, call 1 888-4-Hexion.

2. Hazards identification

Form	Liquid
OSHA/HCS status	This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).
Emergency overview	DANGER ! EXTREMELY FLAMMABLE LIQUID AND VAPOR. FLAMMABLE. MAY FORM EXPLOSIVE MIXTURES WITH AIR. VAPOR MAY CAUSE FLASH FIRE. INHALATION CAUSES HEADACHES, DIZZINESS, DROWSINESS AND NAUSEA AND MAY LEAD TO UNCONSCIOUSNESS. CAUSES RESPIRATORY TRACT, EYE AND SKIN IRRITATION. MAY CAUSE ALLERGIC SKIN REACTION.

Potential acute health effects

Inhalation	Can cause central nervous system (CNS) depression. Irritating to respiratory system.
Ingestion	Can cause central nervous system (CNS) depression.
Skin	Irritating to skin. May cause sensitization by skin contact.
Eyes	Irritating to eyes.

Potential chronic health effects

Chronic effects	Contains material that can cause target organ damage.

Carcinogenicity	No known significant effects or critical hazards.
Mutagenicity	No known significant effects or critical hazards.
Teratogenicity	No known significant effects or critical hazards.
Developmental effects	No known significant effects or critical hazards.
Fertility effects	No known significant effects or critical hazards.
Target organs	Contains material which causes damage to the following organs: kidneys, liver, central nervous system (CNS), Review Section 2 and 11 for any additional assessments.

Over-exposure signs/symptoms

Inhalation	Adverse symptoms may include the following: nausea or vomiting, respiratory tract irritation, coughing, headache, drowsiness/fatigue, dizziness/vertigo, unconsciousness,
Ingestion	Adverse symptoms may include the following: nausea or vomiting, dizziness/vertigo, drowsiness/fatigue, headache, unconsciousness,
Skin	Adverse symptoms may include the following: irritation, redness,
Eyes	Adverse symptoms may include the following: pain or irritation, watering, redness,
Medical conditions aggravated by over-exposure	Pre-existing skin disorders and disorders involving any other target organs mentioned in this MSDS as being at risk may be aggravated by over-exposure to this product.

See section 11 for more detailed information on health effects and symptoms.

3. Composition/Information on ingredients

Ingredient name	CAS number	%
Phenol, 4,4'-(1-methylethylidene)bis[2,6-dibromo-, polymer with 2-(chloromethyl)oxirane and 4,4'-(1-methylethylidene)bis[phenol]	26265-08-7	70.0 - 100.0
Acetone	67-64-1	10.0 - 30.0

***Any applicable Canadian trade secret numbers will be listed in Section 15.*

4. First aid measures

Eye contact	Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Get medical attention.
Skin contact	Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. Continue to rinse for at least 10 minutes. Get medical attention. In the event of any complaints or symptoms, avoid further exposure. Wash clothing before reuse. Clean shoes thoroughly before reuse.
Inhalation	Move exposed person to fresh air. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. Keep person warm and at rest. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial

	respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention.
Ingestion	Wash out mouth with water. Do not induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Get medical attention immediately.
Protection of first aid personnel	No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. If it is suspected that dust, vapor, mist or gas are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus.
Notes to physician	No specific treatment. Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

See section 11 for more detailed information on health effects and symptoms.

5. Fire-fighting measures

Flammability of the product	Extremely flammable liquid. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. The vapor/gas is heavier than air and will spread along the ground. Vapors may accumulate in low or confined areas or travel a considerable distance to a source of ignition and flash back. Runoff to sewer may create fire or explosion hazard.
Extinguishing media	
Suitable	Use dry chemical, CO2, water spray (fog) or foam.
Not suitable	Do not use water jet.
Special exposure hazards	Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.
Hazardous combustion products	Decomposition products may include the following materials: carbon oxides,
Special protective equipment for fire-fighters	Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.
Special Remarks on Explosion Hazards	Liquid and vapor may cause a flash fire or ignite explosively. Vapor is heavier than air and may settle in low places or spread long distances to a source of ignition and flashback. Explosive atmospheres may linger. Closed containers can rupture and release toxic vapors or decomposition products.

6. Accidental release measures

Personal precautions	No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and

unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment (see section 8). Do not breathe dust, vapor, mist or gas.

Environmental precautions

Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Large spill

Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see section 13). Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see section 1 for emergency contact information and section 13 for waste disposal.

Small spill

Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble or absorb with an inert dry material and place in an appropriate waste disposal container. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor.

7. Handling and storage

Handling

Put on appropriate personal protective equipment (see section 8). Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Persons with a history of skin sensitization problems should not be employed in any process in which this product is used. Do not get in eyes or on skin or clothing. Do not ingest. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use non-sparking tools. Take precautionary measures against electrostatic discharges. To avoid fire or explosion, dissipate static electricity during transfer by grounding and bonding containers and equipment before transferring material. Follow US NFPA 30, "Flammable & Combustible Liquids Code", or other national, state and local codes on safe handling of flammable liquids. Train workers in the recognition and prevention of hazards associated with the storage, handling and transfer of flammable liquids in the plant. Empty containers retain product residue and can be hazardous. Do not reuse container. Do not breathe dust, vapor, mist or gas.

Storage

Store in an area designated for storage of flammable liquids (See NFPA 30 and OSHA 29 CFR 1910.106). Store in original container protected from direct sunlight in a dry, cool and well-ventilated area,

away from incompatible materials (see section 10) and food and drink. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

8. Exposure controls/personal protection

Ingredient name	Occupational exposure limits
Acetone	**ACGIH TLV 8-hr TWA** 1,188 mg/m3 500 ppm **ACGIH TLV STEL (15 min)** 1,782 mg/m3 750 ppm **OSHA PEL 8-hr TWA** 2,400 mg/m3 1,000 ppm

Consult local authorities for acceptable exposure limits.

Recommended monitoring procedures

If this product contains ingredients with exposure limits, personal, workplace atmosphere or biological monitoring may be required to determine the effectiveness of the ventilation or other control measures and/or the necessity to use respiratory protective equipment.

Engineering measures

Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

Hygiene measures

Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Respiratory

Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

Hands

Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary.

Eyes

Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists or dusts.

Skin

Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be

approved by a specialist before handling this product.

Environmental exposure controls	Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation.In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

9. Physical and chemical properties

Form	Liquid
Flash point	-18 °C(0 °F) Tag Closed Cup ASTM D 56
Flammable limits	
Lower:	2.6 %(V) (Solvent)
Upper:	12.8 %(V) (Solvent)
Color	Yellow
Boiling point	56 °C(133 °F) (Solvent)
Relative density	1.23
Vapor pressure	247.98 mbar @ 60 °F(60 °F) (Solvent)
Solubility	Partial
Evaporation rate	5.6 (n-Butyl acetate=1) (Solvent)
Vapor density	2

10. Stability and reactivity

Stability	The product is stable. Under normal conditions of storage and use, hazardous polymerization will not occur.
Conditions to avoid	Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition. Do not allow vapor to accumulate in low or confined areas.
Materials to avoid	Highly reactive or incompatible with the following materials: oxidizing materials, acids, alkalis, amines
Other hazards	Reacts with considerable heat release with some curing agents.
Hazardous decomposition products	Under normal conditions of storage and use, hazardous decomposition products should not be produced. Decomposition products may include the following materials: carbon monoxide, aldehydes, acids, other organic compounds,

11. Toxicological information

Acute toxicity

Ingredient name

Phenol, 4,4'-(1-methylethylidene)bis[2,6-dibromo-, polymer with 2-(chloromethyl)oxirane and 4,4'-(1-methylethylidene)bis[phenol]

	LD50	Oral	Rat	> 12,000 mg/kg
	LD50	Dermal	Rat	> 2,000 mg/kg
Acetone				
	LD50	Oral	Rat	5,800 mg/kg
	LD50	Oral	Mouse	3,000 mg/kg
	LD50	Oral	Rabbit	5,340 mg/kg
	LC50	Inhalation	Rat	50.1 mg/l/8 h
	LC50	Inhalation	Mouse	44 mg/l/4 h
	LD50	Dermal	Rabbit	20,000 mg/kg

Other Toxicological Information

Carcinogenicity

Classification

Ingredient name

Phenol, 4,4'-(1-methylethylidene)bis[2,6-dibromo-, polymer with 2-(chloromethyl)oxirane and 4,4'-(1-methylethylidene)bis[phenol]

	ACGIH	Not classified
	IARC	Not classified
	NTP	Not listed
	OSHA	Not regulated

Acetone

	ACGIH	Not classifiable as to its carcinogenicity to humans.
	IARC	Not classified
	NTP	Not listed
	OSHA	Not regulated

12. Ecological information

Environmental effects

No known significant effects or critical hazards.

Aquatic ecotoxicity

Ingredient name

Acetone

Fresh water	Acute LC50 8,300 mg/l/96 h	Bluegill
Fresh water	Acute LC50 > 100 mg/l/96 h	Fathead minnow

Other adverse effects

No known significant effects or critical hazards.

13. Disposal considerations

Waste disposal

The generation of waste should be avoided or minimized wherever possible. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

14. Transportation

The data provided in this section is for information only and may not be specific to your package size or mode of transport. You will need to apply the appropriate regulations to properly classify your shipment for transportation.

International transport regulations

Regulatory Information	UN number	Proper shipping name	Classes/*PG	Reportable Quantity (RQ)
CFR	1866	RESIN SOLUTION (Acetone)	Class 3 II	Acetone
IMO/IMDG	1866	RESIN SOLUTION contains (Acetone)	Class 3 II	Acetone
IATA (Cargo)	1866	RESIN SOLUTION contains (Acetone)	Class 3 II	Acetone

*PG : Packing group

15. Regulatory information

US regulations

HCS Classification Flammable liquid, Irritating material, Sensitizing material, Target organ effects

U.S. Federal regulations

SARA 311/312 Classification Immediate (acute) health hazard, Delayed (chronic) health hazard, Fire hazard

SARA 313 - Supplier Notification
This product contains the following toxic chemical(s) subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and Subpart C-Supplier Notification Requirement of 40 CFR Part 372.
None required.

SARA 302 Extremely Hazardous Substances None required.

State regulations

Massachusetts RTK Substances The following components are listed: Acetone,

New Jersey RTK Hazardous Substances The following components are listed: Acetone,

Pennsylvania RTK Hazardous Substances The following components are listed: Acetone,

California Prop. 65: None required.

Canada

WHMIS (Canada) Class B-2: Flammable liquid
Class D-2B: Material causing other toxic effects (Toxic).

Canadian lists **Canadian NPRI:** None required.

International regulations

Chemical inventories

Europe Inventory All components are listed or exempted.
Japan Inventory (ISHL) Not determined.
Philippines Inventory (PICCS) All components are listed or exempted.
New Zealand Inventory of Chemicals (NZIoC) Not determined.
Japan Inventory (ENCS) All components are listed or exempted.
Korea Inventory (KECI) All components are listed or exempted.
Australia Inventory (AICS) All components are listed or exempted.
China Inventory (IECSC) All components are listed or exempted.
Canada Inventory All components are listed or exempted.
United States Inventory (TSCA 8b) All components are listed or exempted.

16. Other information

Hazardous Material Information System III (U.S.A.)

Health : 2
Flammability: 3
Physical hazards : 0
Chronic : *

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks Although HMIS® ratings are not required on MSDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.
The customer is responsible for determining the PPE code for this material.

Prepared by	Product Safety & Regulatory Compliance Group, (281)325-3391
Date of Issue	12-DEC-2008
Date of printing	23-MAR-2010
Version	15.2

Notice to reader

The information provided herein was believed by Hexion Specialty Chemicals ("Hexion") to be accurate at the time of preparation or prepared from sources believed to be reliable, but it is the responsibility of the user to investigate and understand other pertinent sources of information, to comply with all laws and procedures applicable to the safe handling and use of the product and to determine the suitability of the product for its intended use. All products supplied by Hexion are subject to Hexion's terms and conditions of sale. HEXION MAKES NO WARRANTY, EXPRESS OR IMPLIED, CONCERNING THE PRODUCT OR THE MERCHANTABILITY OR FITNESS THEREOF FOR ANY PURPOSE OR CONCERNING THE ACCURACY OF ANY INFORMATION PROVIDED BY HEXION, except that the product shall conform to Hexion's specifications. Nothing contained herein constitutes an offer for the sale of any product.

Rineco

819 Vulcan Road -- Haskell
P.O. Box 729, Benton, AR
Office (501) 778-9089 Fax (501) 776-2864
Attn: Rachael Billings

FOR OFFICE USE ONLY

Account Rep:	Steve Haines	Walk Through:	No
Region:	N05	Special Instructions:	No
Profile #:	0910-17388	Create Date:	10/2/2009
Broker Profile ID:		Last Cert Date:	8/11/2011
Status:	Approved -- Rineco Processing	Expiration Date:	8/10/2012
Process:			

I. WASTE MATERIAL PROFILE SHEET

In accordance with the Federal and State regulations, it is necessary for the Generator of hazardous waste to properly identify the waste for their records as well as to supply the disposal facility with the information necessary to handle the waste. The information outlined below must be complete, and signed by the generator. PLEASE PRINT LEGIBLY OR TYPE.

Generator Name: *Industrial Laminates - Norplex Inc.*
USEPA I.D. No. *IAD073489288*
State I.D. No.

Address: *665 Lybrand Street*
Phone: *563-864-4232*
Fax: 4235

Postville, IA 52162

Technical Contact: *Timothy Delaney*
Title:

24 Hour Emergency Contact: *RES*
24 hour Phone: *877-737-5277*

Is this material located or generated in a foreign country? No
Foreign Address:

II. GENERAL INFORMATION

Material Name: Waste Phenolic / Epoxy (918)
Source Code:

- Yes — A. Does waste exhibit the characteristic of ignitability as defined in 40 CFR 261.21?
- No — B. Does waste exhibit the characteristic of corrosivity as defined in 40 CFR 261.22?
- No — C. Does waste exhibit the characteristic of reactivity as defined in 40 CFR 261.23?
- Yes — D. Is waste a spent solvent as defined in 40 CFR 261.31?
- No — E. Is waste a discarded chemical product, off spec, container or spill residues as defined in 40 CFR 261.33?

Detailed description of process generating waste: Line wash up

Anticipated Monthly Volume: 80
Bulk: No Drum: Yes Other: No

III. MATERIAL COMPOSITION

COMPONENT	Concentration Min	Max	Actual	PPM
Dimethylformamide	0.00	5.00		
Isopropyl Alcohol	0.00	5.00		
Methyl Ethyl Ketone	0.00	5.00		
N-Butyl Alcohol	0.00	5.00		
Propylene Glycol Methyl Ether	0.00	5.00		
Resin	5.00	40.00		
Acetone	30.00	40.00		
Toluene	30.00	40.00		

IV. PHYSICAL CHARACTERISTICS

Physical State:	Liquid
Free Liquid:	Yes
Viscosity:	NA
Layers:	Bi-Layered
Odor:	Mild
Flash Point:	74-140F
BTU:	
pH Level:	
Actual pH:	4-10
Density:	

V. OTHER CHARACTERISTICS

No	Explosive	No	Dioxin
No	Radioactive	No	Shock Sensitive
No	Sulfide	No	PCB
No	Etiological	No	Cyanide
No	Pyrophoric	No	Water Reactive

VI. SHIPPING INFORMATION

Profile #: 0910-17388

DOT Hazardous Material: Yes ER Guide #: 128

Proper Shipping Name: Waste Flammable liquids, n.o.s. (Toluene / Acetone)

Hazard Class and Division: 3 UN or NA: UN1993 Packaging Group: III

RQ: Yes If Yes: D001 @ 100 LBS Addl. Info:

USEPA HAZARDOUS WASTE: Yes

Waste I.D. Numbers:	D001 F003 F005

VII. INDICATE IF THIS WASTE CONTAINS ANY OF THE FOLLOWING CHARACTERISTICS as defined by 40 CFR 261.24.

Check only if waste exceeds regulatory threshold levels and include analytical data if available.

Constituent		Regulatory level PPM	TCLP PPM	Total PPM	Know ledge	Constituent		Regulatory level PPM	TCLP PPM	Total PPM	Know ledge
D004	Arsenic	5.0				D024	m-Cresol	200.0			
D005	Barium	100.0				D025	p-Cresol	200.0			
D006	Cadmium	1.0				D026	Cresol	200.0			
D007	Chromium	5.0				D027	1,4,Dichlorobenzene	7.5			
D008	Lead	5.0				D028	1,2,Dichloroethane	0.5			
D009	Mercury	0.2				D029	1,1 Dichloroethylene	0.7			
D010	Selenium	1.0				D030	2,4 Dinitrotoluene	0.13			
D011	Silver	5.0				D031	Heptachlor	0.008			
D012	Endrin	0.02				D032	Hexachlorobenzene	0.13			
D013	Lindane	0.4				D033	Hexachlorobutadiene	0.5			
D014	Methoxychlor	10.0				D034	Hexachloroethane	3.0			
D015	Toxaphene	0.5				D035	Methyl Ethyl Ketone	200.0			
D016	2,4 Dichlorophenoxyacetic acid	10.0				D036	Nitrobenzene	2.0			
D017	2,4,5 TP Silvex	1.0				D037	Pentachlorophenol	100.0			
D018	Benzene	0.5				D038	Pyridine	5.0			
D019	Carbon Tetrachloride	0.5				D039	Tetrachloroethylene	0.7			
D020	Chlordane	0.03				D040	Trichloroethylene	0.5			
D021	Chlorobenzene	100.0				D041	2,4,5 Trichlorophenol	400.0			
D022	Chloroform	6.0				D042	2,4,6 Trichlorophenol	2.0			
D023	o-Cresol	200.0				D043	Vinyl Chloride	0.2			

VIII. Benzene Waste Operations NESHAP Generator Certification. Complete this section if benzene is present in waste.

1. Is this waste generated by an industry with any of the following SIC Codes: 2911,2800-2899,3312 or 4953?
2. Does this stream have Benzene concentration of 10ppm or more?
3. Does this stream contain greater than 10% moisture?
4. Is this company's Total Annual Benzene (TAB) of 10Mg or greater per year?
5. Is benzene notice (subject to Subpart FF) required?

GENERATOR CERTIFICATION: THIS CERTIFICATION IS REQUIRED FOR EACH PROFILE.

This above information is to be held confidential and is true and accurate to the best of my knowledge.

Signature: _____ Date: 8-15-2011

Print Name: Timothy J. Delaney Title Manufacturing Engineer

ATTACHMENT 13

HAZARDOUS WASTE MANIFESTS

(32 Pages)

INVOICE

RINECO
Innovative waste management
819 Vulcan Rd -- Haskell
Benton, AR 72015
PH: 501-778-9089 -- FAX: 501-778-1096

Remit To: P.O. Box 729
Benton, AR 72018

INVOICE : C042216
INVOICE DATE: 4/21/2012
DUE DATE: 5/21/2012

N05 LORIE BOUDRA

IND350

INDUSTRIAL LAMINATES / NORPLEX
PO BOX 977
POSTVILLE IA 52162

CONTACT:

GENERATOR:

INDUSTRIAL LAMINATES - NORPLEX INC.
665 LYBRAND STREET
POSTVILLE, IA 52162

DESTINATION: RINECO

MANIFEST #: 004680190FLE
MANIFEST DATE: 4/21/2012
LOAD NUMBER: 208925

CUSTOMER PO: SHIP VIA: SAVANNAH TRANSPORT, INC. TERMS: NET 30 DAYS

LINE	PROFILE	MATERIAL NAME / DESCRIPTION	CONTAINER INFO	UNIT	PROCESSED	UNIT PRICE	EXTD PRICE	ITEM # (If req'd.)
1.	0910-17388	Waste Phenolic / Epoxy (918)						
		D1 DISPERSIBLE 55 GAL	13 DM; 6,283 lbs.	DRM	13.00	34.00	442.00	
		D2 DISPERSIBLE 55 GAL	1 DM; 468 lbs.	DRM	1.00	34.00	34.00	
		L1 LIQUID 55 GAL	46 DM; 22,746 lbs.	DRM	46.00	34.00	1564.00	
		S2 SHRED SOLID 55 GAL	4 DM; 1,958 lbs.	DRM	4.00	34.00	136.00	
	0910-17386	Waste Melamine (906)						
		D1 DISPERSIBLE 55 GAL /F1 LOW BTU	3 DM; 1,408 lbs.	DRM	3.00	34.00	102.00	
		D2 DISPERSIBLE 55 GAL /F1 LOW BTU	1 DM; 595 lbs.	DRM	1.00	34.00	34.00	
		S2 SHRED SOLID 55 GAL /F1 LOW BTU	6 DM; 2,913 lbs.	DRM	6.00	34.00	204.00	
3.	0910-17387	Waste Rags (932)						
		S2 SHRED SOLID 55 GAL	2 DM; 879 lbs.	DRM	2.00	105.00	210.00	
4.	0910-17389	Waste Still Bottoms (934)						
		S2 SHRED SOLID 55 GAL /F1 LOW BTU	4 DM; 1,866 lbs.	DRM	4.00	88.00	352.00	
		TRANSPORTATION		EACH	1.00	1842.00	1842.00	

1

DA
4-30-12

6018
Acct#
419-1
4-30-12

INVOICE TOTAL: 4,920.00
US DOLLARS

Attachment 13 Page 1 of 32

UNOFFICIAL MANIFEST FOR BILLING PURPOSES ONLY!

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-003

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: IAD073489288
2. Page 1 of: 1
3. Emergency Response Phone: 877-737-5277 CID #36576
4. Manifest Tracking Number: 004680190 FLE

GENERATOR

5. Generator's Name and Mailing Address
Industrial Laminates - Norplex Inc.
665 Lybrand Street
Postville, IA 52162
Generator's Phone: 563-864-4232 Timothy Delaney

Generator's Site Address (if different than mailing address)
Industrial Laminates - Norplex Inc.
665 Lybrand Street
Postville, IA 52162

6. Transporter 1 Company Name: Savannah Transport, Inc.
U.S. EPA ID Number: KS0000336891

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
RINECO
1007 Vulcan Road
Benton, AR 72015
Facility's Phone: 501-778-9089
U.S. EPA ID Number: ARD981057870

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, UN1993, Waste Flammable liquids, n.o.s. (Toluene / Acetone), 3, PG III, (D001 @ 100 LBS)	64	DM	30,740	P	D001	F003	F005
X	2. RQ, UN1993, Waste Flammable liquids, n.o.s. (N-Butyl Alcohol / Toluene), 3, PG III, (D001 @ 100 LBS)	10	DM	5,126	P	D001	F003	F005
X	3. RQ, UN3175, Waste Solids containing flammable liquid, n.o.s. (Toluene / Acetone), 4.1, PG II, (D001 @ 100 LBS)	2	DM	584	P	D001	F003	F005
X	4. RQ, UN3175, Waste Solids containing flammable liquid, n.o.s. (Ethanol / Isopropanol), 4.1, PG II, (D001 @ 100 LBS)	4	DM	1584	P	D001	F003	F005

14. Special Handling Instructions and Additional Information
1. 0910-17300 ERG# 128 Waste Phenolic / Epoxy (918)
2. 0910-17306 ERG# 128 Waste Melamine (906)
3. 0910-17307 ERG# 133 Waste Rags (932)
4. 0910-17309 ERG# 133 Waste Still Bottoms (934)

Appropriate placards offered to the carrier by the shipper
PO # 04/20/2012
Pickup ~~04/19/2012~~ 8:00 AM LOAD # 208925

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Timothy Delaney
Signature:
Month 04 Day 20 Year 12

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: RICHARD LOHR
Signature:
Month 4 Day 20 Year 12
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
Attachment 13 Page 2 of 32
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H061 2. H061 3. H061 4. H061

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: WHITNEY LEWIS
Signature:
Month 4 Day 21 Year 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	LAD073489288
2. Page 1 of	1
3. Emergency Response Phone	[illegible]
4. Manifest Tracking Number	004680190 FLE

5. Generator's Name and Mailing Address
Industrial Laminates - Norplex Inc.
665 Lybrand Street
Postville, IA 52162

Generator's Phone: 563-864-4232 [illegible]

Generator's Site Address (if different than mailing address)
Industrial Laminates - Norplex Inc.
665 Lybrand Street
Postville, IA 52162

6. Transporter 1 Company Name
Savannah Transport, Inc
U.S. EPA ID Number: KS0000336691

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
RINECO
1007 Vulcan Road
Benton, AR 72015
Facility's Phone: 501 778-9089
U.S. EPA ID Number: ARD981057870

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, UN1993, Waste Flammable Liquids, n.o.s. (Toluene / Acetone), 3, PG III, [illegible]	64	DM	3094	P	D001	F003	F005
X	2. RQ, UN1993, Waste Flammable Liquids, n.o.s. (Methyl Alcohol / Toluene), 3, PG III, [illegible]	10	DM	5736	P	D001	F003	F005
X	3. RQ, UN3175, Waste Solids containing flammable liquid, n.o.s. (Toluene / Acetone), 4.1, PG II, [illegible]	2	DM	584	P	D001	F003	F005
X	4. RQ, UN3175, Waste Solids containing flammable liquid, n.o.s. (Ethanol / Isopropanol), 4.1, PG II, [illegible]	4	DM	1844	P	D001	F003	F005

14. Special Handling Instructions and Additional Information
1. [illegible] Waste Phenolic / Epoxy [illegible]
2. [illegible] Waste Melamine [illegible]
3. [illegible] Waste Rags [illegible]
4. [illegible] Waste [illegible]

Appropriate placards [illegible]
[illegible]
PO # [illegible] /20/2012
Pickup [illegible] 8:00 AM [illegible]

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Timothy Dehm[illegible] Signature: [signature] Month 07 Day 20 Year 12

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: ______
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Richard Lord Signature: [signature] Month 7 Day 20 Year 12
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number

Attachment 13 Page 3 of 32

Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H061	H050	H061	H061

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name Signature Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

GENERATOR'S INITIAL COPY

HAZARDOUS WASTE LOG

	DRM #	DATE	DESCRIPTION	WASTE STREAM	DATE OUT
490#	#1	3-15-2012	Resin Solution	F005	
510#	#2	3-19-2012	Resin Solution	F005	
496#	#3	3-16-2012	Resin Solution	F005	
520#	#4	3-16-2012	Melamine+Water	F005	
430#	#5	3-20-2012	Resin Solution	F005	
424#	#6	3-20-2012	Resin Solution	F005	
514#	#7	3-20-2012	Resin Solution	F005	
300#	#8	3-7-2012	RAGS	F005	
432#	#9	3-21-2012	Resin Solution	F005	
480#	#10	3-21-2012	Resin Solution	F005	
566#	#11	3-16-2012	Melamine+Water	F005	
250#	#12	2-27-2012	STILL Bottoms	F005	
424#	#13	3-14-2012	Resin Solution	F005	
440#	#14	3-16-2012	Resin Solution	F005	
458#	#15	3-19-2012	Resin Solution	F005	
488#	#16	3-16-2012	Resin Solution	F005	
516#	#17	3-22-2012	Resin Solution	F005	
542#	#18	3-22-2012	Melamine+Water	F005	
440#	#19	3-22-2012	Resin Solution	F005	
464#	#20	3-19-2012	Resin Solution	F005	
553#	#21	3-9-2012	Resin Solution	F005	
476#	#22	3-9-2012	Resin Solution	F005	
540#	#23	3-9-2012	Resin Solution	F005	
534#	#24	3-9-2012	Resin Solution	F005	
258#	#25	3-23-2012	STILL Bottoms	F005	
412#	#26	3-26-2012	Resin Solution	F005	
560#	#27	3-24-2012	Resin Solution	F005	
430#	#28	3-22-2012	Melamine+Water	F005	
520#	#29	3-27-2012	Resin Solution	F005	
430#	#30	3-27-2012	Resin Solution	F005	
534#	#31	3-26-2012	Melamine+Water	F005	
0#	#32	3-15-2012	Resin Solution	F005	

HAZARDOUS WASTE LOG

	DRM #	DATE	DESCRIPTION	WASTE STREAM	DATE OUT
480#	#33	3-22-2012	Resin Solution	F005	
513#	#34	3-26-2012	Resin Solution	F005	
552#	#35	3-8-2012	Resin Solution	F005	
448#	#36	3-22-2012	Resin Solution	F005	
520#	#37	3-9-2012	Melamine + Water	F005	
450#	#38	3-12-2012	Resin Solution	F005	
376#	#39	3-12-2012	Resin Solution	F005	
528#	#40	3-7-2012	Resin Solution	F005	
490#	#41	3-13-2012	Melamine + Water	F005	
460#	#42	3-15-2012	Resin Solution	F005	
464#	#43	3-14-2012	Resin Solution	F005	
512#	#44	3-14-2012	Resin Solution	F005	
460#	#45	3-14-2012	Resin Solution	F005	
22#	#46	3-13-2012	Resin Solution	F005	
220#	#47	3-7-2012	Resin Solution	F005	
440#	#48	3-14-2012	Resin Solution	F005	
514#	#49	3-27-2012	Resin Solution	F005	
444#	#50	3-26-2012	Resin Solution	F005	
434#	#51	3-27-2012	Resin Solution	F005	
454#	#52	3-28-2012	Resin Solution	F005	
558#	#53	3-8-2012	Resin Solution	F005	
454#	#54	3-12-2012	Resin Solution	F005	
426#	#55	3-13-2012	Resin Solution	F005	
454#	#56	3-12-2012	Resin Solution	F005	
472#	#57	3-26-2012	Resin Solution	F005	
532#	#58	4-2-2012	Resin Solution	F005	
434#	#59	3-29-2012	Resin Solution	F005	
518#	#60	4-2-2012	Resin Solution	F005	
618#	#61	3-9-2012	Resin Solution	F005	
448#	#62	3-28-2012	Resin Solution	F005	
438#	#63	3-28-2012	Resin Solution	F005	
#64		3-28-2012	Resin Solution	F005	

HAZARDOUS WASTE LOG

	DRM #	DATE	DESCRIPTION	WASTE STREAM	DATE OUT
512#	#65	4-2-2012	Resin Solution	F005	
434#	#66	4-4-2012	Resin Solution	F005	
494#	#67	3-30-2012	Melamine + Water	F005	
484#	#68	4-4-2012	Resin Solution	F005	
436#	#69	4-2-2012	Resin Solution	F005	
488#	#70	4-4-2012	Resin Solution	F005	
546#	#71	4-3-2012	Melamine + Water	F005	
284#	#72	3-21-2012	RAGS	F005	
526#	#73	4-4-2012	Resin Solution	F005	
458#	#74	4-10-2012	Resin Solution	F005	
484#	#75	4-5-2012	Melamine + Water	F005	
792#	#76	3-14-2012	Still Bottoms	F005	
530#	#77	3-30-2012	Resin Solution	F005	
96#	#78	3-27-2012	Resin Solution	F005	
480#	#79	4-2-2012	Resin Solution	F005	
284#	#80	3-24-2012	Still Bottoms	F005	

Shipped out 80 Drums on ~~4-19-2012~~ 4-20-2012

10 Drums	Melamine + Water	906^S	5,126#
64 Drums	Resin Solution	918^S	30,740#
02 Drums	RAGS	932^S	584#
04 Drums	Still Bottoms	934^S	1584#

38,034#
+ 800#
38# 8.3 ¼ GAL

Manifest Document #
004680190FLE

RINECO LAND DISPOSAL RESTRICTIONS NOTIFICATION FORM

Generator: Industrial Laminates - Norplex Inc. **EPA ID #** IAD073489288

Pickup Date: 4/19/12 8:00 am **Manifest Doc. #** 004680190FLE

EPA Codes D001 F003 F005 **Profile #** 0910-17388 **Line Item** 1.

EPA Waste Codes		Waste Description & Treatment/ Regulatory Subcategory	NON-WASTEWATER	Concentration in mg/l or Technology Code
[ ]	D001	Ignitable characteristic wastes, except for 261.21(a)(1) High TOC subcategory that are managed Non-CWA/nonCWA equivalent/non class I SDWA systems.		DEACT and meet 268.48 standards or RORGS; or CMBST
[XXX]	D001	High TOC Ignitable characteristic liquids subcategroy based on 40 CFR 261.21(a)(1)-greater than or equal to 10% TOC.		RORGS; or CMBST; or POLYM
[ ]	D002	Corrosive characteristic wastes that are managed in non-CWA non CWA equivalent, or class / SDWA systems.		DEACT & meet 268.48 standards

D004-D011 Heavy Metals Expressed in Concentrations of mg/l (TCLP) and must meet 268.48 Standards. (NON-WASTEWATER)

[ ]	D004	Arsenic 5.0	[ ]	D008	Lead 0.75
[ ]	D005	Barium 21	[ ]	D009	Mercury 0.20 low mercury subcategory
[ ]	D006	Cadmium 0.11	[ ]	D010	Selenium 5.7
[ ]	D007	Chromium 0.60	[ ]	D011	Silver 0.14

D012-D043 Concentrations Expressed in mg/kg, and Must Meet 268.48 Standards. (NON-WASTEWATER)

[ ]	D012	Endrin 0.13	[ ]	D024	m-cresol 5.6	[ ]	D036	Nitorbenzene 14
[ ]	D013	Lindane 0.066	[ ]	D025	p-cresol 5.6	[ ]	D037	Pentachlorophenol 7.4
[ ]	D014	Methoxychlor 0.18	[ ]	D026	Cresol Mixed Isomer 11.2	[ ]	D038	Pyridine 16
[ ]	D015	Toxaphene 2.6	[ ]	D027	p-dichlorbenzene 6.0	[ ]	D039	Tetrachloroethylene 6.0
[ ]	D016	2,4 D 10	[ ]	D028	1,2-dichloroethane 6.0	[ ]	D040	Trichlorethylene 6.0
[ ]	D017	2,4,5-TP Silvex 7.9	[ ]	D029	1,1-dichloroethylene 6.0	[ ]	D041	2,4,5-Trichlorophenol 7.4
[ ]	D018	Benzene 10	[ ]	D030	2,4-dinitrotoluene 140	[ ]	D042	2,4,6-Trichlorophenol 7.4
[ ]	D019	Carbon Tetrachloride 6.0	[ ]	D031	Heptachlor & epoxides 0.066	[ ]	D043	Vinyl Chloride 6.0
[ ]	D020	Chlordane 0.26	[ ]	D032	Hexachlorbenzene 10			
[ ]	D021	Chlorobenzene 6.0	[ ]	D033	Hexachlorobutadiene 5.6			
[ ]	D022	Chloroform 6.0	[ ]	D034	Hexachloroethane 30			
[ ]	D023	o-cresol 5.6	[ ]	D035	Methyl Ethyl Ketone 36			

F001-F005 Spent Solvents: concentrations expressed mg/kg (NON-WASTEWATER) **F003-F005 Non-Wastewater spent solvents expressed in mg/l (TCLP)**

[XXX]	Acetone 160	[ ]	Isobutyl Alcohol 170	[ ]	Carbon disulfide 4.8
[ ]	Benzene 10	[ ]	Methylene Chloride 30	[ ]	Cyclohexanone 0.75
[XXX]	N-butyl alcohol	[XXX]	Methyl Ethyl Ketone 36	[ ]	Methanol 0.75
[ ]	carbontetrachloride 6.0	[ ]	Methyl Isobutyl Ketone 33		
[ ]	chlorobenzene 6.0	[ ]	Nitrobenzene 14		
[ ]	o-cresol 5.6	[ ]	Pyridine 16		
[ ]	m-cresol 5.6	[ ]	Tetrachloroethylene 6.0		
[ ]	p-cresol 5.6	[XXX]	Toluene 10		
[ ]	Cresol mixed isomers 11.2	[ ]	111-Trichloroethane 6.0		
[ ]	O-Dichlorobenzene 6.0	[ ]	112-Trichloroethane 6.0		
[ ]	Ethyl Acetate 33	[ ]	112-Trichloro-122-trifluoroethane 30		
[ ]	Ethyl Benzene 10	[ ]	Trichloroethylene 6.0		
[ ]	Ethyl Ether 160	[ ]	Trichloromonofluoromethane 30		
		[ ]	Xylene (mixed isomers) 30		

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Generator Name: Industrial Laminates - Norplex Inc. **Rineco Profile #** 0910-17388

Manifest Doc. #: 004680190FLE

f the specified treatment technology of "DEACT" and meet 268.48 Standard" is identified, then each underlying hazardous constituent present n waste at the point of generation that is at a level above the F039 constituent specific treatment standard must be listed. Please check the box next to each constituent present to note the constituent(s) that must be managed under 40 CFR268.7.

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	Check Here	mg/kg3		Check Here	mg/kg3
A2213		1.4	Chlordane (alpha & gamma isomers)		0.26
Acenaphthylene		3.4	p-Chloroaniline		16
Acenaphthene		3.4	Chlorobenzene		6.0
Acetone		160	Chlorobenzilate		NA
Acetonitrile		38	2-Chloro-1,3-butadiene		0.28
Acetophenone		9.7	Chlorodibromomethane		15
2-Acetylaminofluorene		140	Chloroethane		6.0
Acrolein		NA	bis (2-Chloroethoxy) methane		7.2
Acrylamide		23	bis (2-Chloroethyl) ether		6.0
Acrylonitrile		84	Chloroform		6.0
Aldicarb Sulfone		0.28	bis (2-Chloroisopropyl) ether		7.2
Aldrin		0.066	p-Chloro-m-cresol		14
4-Aminobiphenyl		NA	2-Chloroethyl Vinyl Ether		NA
Aniline		14	Chloromethane / Methyl Chloride		30
Anthracene		3.4	2-Chloronaphthalene		5.6
Aramite		NA	2-Chlorophenol		5.7
alpha-BHC		0.066	3-Chloropropylene		30
beta-BHC		0.066	Chrysene		3.4
delta-BHC		0.066	o-Cresol		5.6
gamma-BHC		0.066	m-Cresol		5.6
Barban		1.4	p-Cresol		5.6
Bendiocarb		1.4	m-Cumenyl Methylcarbamate		1.4
Bendiocarb Phenol		1.4	Cyclohexanone		0.75 mg/L TCLP
Benomyl		1.4	o,p'-DDD		0.087
Benzene		10	p,p'-DDD		0.087
Benz (a) anthracene		3.4	o,p'-DDE		0.087
Benzal Chloride		6.0	p,p'-DDE		0.087
Benzo (b) fluoranthene		6.8	o,p'-DDT		0.087
Benzo (k) fluoranthene		6.8	p,p'-DDT		0.087
Benzo (g,h,i) perylene		1.8	Dibenz (a,h) anthracene		8.2
Benzo (a) pyrene		3.4	Dibenz (a,e) pyrene		NA
Bromodichloromethane		15	1,2-Dibromo-3-chloropropane		15
Bromomethane / Methyl Bromide		15	1,2-Dibromoethane/Ethylene Dibromide		15
4-bromophenyl Phenyl Ether		15	Dibromomethane		15
n-butyl Alcohol		2.6	m-Dichlorobenzene		6.0
Butylate		1.4	o-Dichlorobenzene		6.0
Butyl Benzyl Phthalate		28	p-Dichlorobenzene		6.0
2-sec-Butyl-4,6-dinitrophenol/Dinoseb		2.5	Dichlorodifluoromethane		7.2
Carbaryl		0.14	1,1-Dichloroethane		6.0
Carbenzadim		1.4	1,2-Dichloroethane		6.0
Carbofuran		0.14	1,1-Dichloroethylene		6.0
Carbofuran Phenol		1.4	trans-1,2-Dichloroethylene		30
Carbon Disulfide		4.8 mg/L TCLP	2,4-Dichlorophenol		14
Carbon Tetrachloride		6.0	2,6-Dichlorophenol		14
Carbosulfan Disulf		1.4 Disulfi	2, 4-Dichlorophenoxyacetic Acid/2, 4-D		10

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**		**Check Here**	**mg/kg3**
1, 2-Dichloropropane		18	Hexachloropropylene		30
cis-1, 3-Dichloropropylene		18	Indeno (1,2,3-c,d) pyrene		3.4
trans-1, 3-Dichloropropylene		18	Iodomethane		65
Dieldrin		0.13	Isobutyl Alcohol		170
Diethylene Glycol, Dicarbamate		1.4	Isodrin		0.066
Diethyl Phthalate		28	Isolan		1.4
p-Dimethylaminoazobenzene		NA	Isosafrole		2.6
2-4-Dimethyl Phenol		14	Kepone		0.13
Dimethyl Phthalate		28	Methacrylonitrile		84
Dimetilan		1.4	Methanol		0.75 mg/L TCLP
Di-n-butyl Phthalate		28	Methapyrilene		1.5
1, 4-Dinitrobenzene		2.3	Methiocarb		1.4
4, 6-Dinitro-o-cresol		160	Methomyl		0.14
2, 4-Dinitrophenol		160	Methoxychlor		0.18
2, 4-Dinitrotoluene		140	3-Methylcholanthrene		15
2, 6-Dinitrotoluene		28	4, 4-Methylene bis (2-chloroaniline)		30
Di-n-octyl Phthalate		28	Methylene Chloride		30
Di-n-propylnitrosamine		14	Methyl Ethyl Ketone		36
1, 4-Dioxane		170	Methyl Isobutyl Ketone		33
Diphenylamine		13	Methyl Methacrylate		160
Diphenylnitrosamine		13	Methyl Methansulfonate		NA
1, 2-Diphenylhydrazine		NA	Methyl Parathion		4.6
Disulfoton		6.2	Metolcarb		1.4
Dithiocarbamates (total)		28	Mexacarbate		1.4
Endosulfan I		0.066	Molinate		1.4
Endosulfan II		0.13	Naphthalene		5.6
Endosulfan Sulfate		0.13	2-Naphthylamine		NA
Endrin		0.13	o-Nitroaniline		14
Endrin Aldehyde		0.13	p-Nitroaniline		28
EPTC		1.4	Nitrobenzene		14
Ethyl Acetate		33	5-Nitro-o-toluidine		28
Ethyl Benzene		10	o-Nitrophenol		13
Ethyl Cyanide/Propanenitrile		360	p-Nitrophenol		29
Ethyl Ether		160	N-Nitrosodiethylamine		28
bis (2-Ethylhexyl) Phthalate		28	N-Nitrosodimethylamine		2.3
Ethyl Methacrylate		160	N-Nitroso-di-n-butylamine		17
Ethylene Oxide		NA	N-Nitrosomethylethylamine		2.3
Famphur		15	N-Nitrosomorpholine		2.3
Fluoranthene		3.4	N-Nitrosopiperidine		35
Fluorene		3.4	N-Nitrosopyrrolidine		35
Formetanate Hydrochloride		1.4	Oxamyl		0.28
Formparanate		1.4	Parathion		4.6
Heptachlor		0.066	Total PCBs (Sum of all PCB Isomers, or all Arochlors)		10
Heptachlor Epoxide		0.066	Pebulate		1.4
Hexachlorobenzene		10	Pentachlorobenzene		10
Hexachlorobutadiene		5.6	PeCDDs (All Pentachlorodibenzo-p-dioxins)		0.001
Hexachlorocyclopentadiene		2.4	PeCDFs (All Pentachlorodibenzofurans)		0.001
HxCDDs (All Hexachlorodibenzo-p-dioxins)		0.001	Pentachloroethane		6.0
HxCDFs (All Hexachlorodibenzofurans)		0.001	Pentachloronitrobenzene		4.8
Hexachloroethane		30	Pentachlorophenol		7.4

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**	**II. Inorganic Constituents**	**Check Here**	**mg/kg3**
Phenacetin		16	Antimony		1.15 mg/l TCLP
Pl :hrene		5.6	Arsenic		5.0 mg/L TCLP
Phenol		6.2	Barium		21 mg/l TCLP
o-Phenylenediamine		5.6	Beryllium		1.22 mg/l TCLP
Phorate		4.6	Cadmium		0.11 mg/l TCLP
Phthalic Acid		28	Chromium (Total)		0.60 mg/l TCLP
Phthalic Anhydride		28	Cyanides (Total)		590
Physostigmine		1.4	Cyanides (Amenable)		30
Physostigmine Salicylate		1.4	Fluoride		NA
Promecarb		1.4	Lead		0.75 mg/l TCLP
Pronamide		1.5	Mercury-Nonwastewater from retort		0.20 mg/l TCLP
Propham		1.4	Mercury-All Others		0.025 mg/l TCLP
Propoxur		1.4	Nickel		11 mg/l TCLP
Prosulfocarb		1.4	Selenium		5.7 mg/l TCLP
Pyrene		8.2	Silver		0.14 mg/l TCLP
Pyridine		16	Sulfide		NA
Safrole		22	Thallium		0.20 mg/l TCLP
Silvex / 2,4,5-TP		7.9	Vanadium		1.6 mg/l TCLP
1,2,4,5-Tetrachlorobenzene		14	Zinc		4.3 mg/l TCLP
TCDDs (All Tetrachlorodibenzo-p-dioxins)		0.001			
TCDFs (All Tetrachlordibenzofurans)		0.001			
1,1,1,2-Tetrachloroethane		6.0			
1,1,2,2-Tetrachloroethane		6.0			
Tetrachloroethylene		6.0			
2,3,4,6-Tetrachlorophenol		7.4			
Thi :)		1.4			
Thiophanate-methyl		1.4			
Tirpate		0.28			
Toluene		10			
Toxaphene		2.6			
Triallate		1.4			
Tribromomethane/Bromoform		15			
2,4,6-Tribromophenol		7.4			
1,2,4-Trichlorobenzene		19			
1,1,1-Trichloroethane		6.0			
1,1,2-Trichloroethane		6.0			
Trichloroethylene		6.0			
Trichloromonofluoromethane		30			
2,4,5-Trichlorophenol		7.4			
2,4,6-Trichlorophenol		7.4			
2,4,5-Trichlorophenoxyacetic Acid/2,4,5-T		7.9			
1,2,3-Trichloropropane		30			
1,1,2-Trichloro-2,2,2-trifluoroethane		30			
Triethylamine		1.5			
tris-(2,3-Dibromopropyl) Phosphate		0.10			
Vernolate		1.4			
Vinyl Chloride		6.0			
Xyler sum of o-,m-,p-xylene concetrations)		30			

RINECO LAND DISPOSAL RESTRICTIONS NOTIFICATION FORM

Generator: Industrial Laminates - Norplex Inc. **EPA ID #** IAD073489288

Pickup Date: 4/19/12 8:00 am **Manifest Doc. #** 004680190FLE

EPA Codes D001 F003 F005 **Profile #** 0910-17386 **Line Item** 2.

EPA Waste Codes		Waste Description & Treatment/ Regulatory Subcategory	NON-WASTEWATER	Concentration in mg/l or Technology Code
[ ]	D001	Ignitable characteristic wastes, except for 261.21(a)(1) High TOC subcategory that are managed Non-CWA/nonCWA equivalent/non class I SDWA systems.		DEACT and meet 268.48 standards or RORGS; or CMBST
[XXX]	D001	High TOC Ignitable characteristic liquids subcategroy based on 40 CFR 261.21(a)(1)-greater than or equal to 10% TOC.		RORGS; or CMBST; or POLYM
[ ]	D002	Corrosive characteristic wastes that are managed in non-CWA non CWA equivalent, or class I SDWA systems.		DEACT & meet 268.48 standards

D004-D011 Heavy Metals Expressed in Concentrations of mg/l (TCLP) and must meet 268.48 Standards. (NON-WASTEWATER)

[ ]	D004	Arsenic 5.0	[ ]	D008	Lead 0.75
[ ]	D005	Barium 21	[ ]	D009	Mercury 0.20 low mercury subcategory
[ ]	D006	Cadmium 0.11	[ ]	D010	Selenium 5.7
[ ]	D007	Chromium 0.60	[ ]	D011	Silver 0.14

D012-D043 Concentrations Expressed in mg/kg, and Must Meet 268.48 Standards. (NON-WASTEWATER)

[ ]	D012	Endrin 0.13	[ ]	D024	m-cresol 5.6	[ ]	D036	Nitorbenzene 14
[ ]	D013	Lindane 0.066	[ ]	D025	p-cresol 5.6	[ ]	D037	Pentachlorophenol 7.4
[ ]	D014	Methoxychlor 0.18	[ ]	D026	Cresol Mixed Isomer 11.2	[ ]	D038	Pyridine 16
[ ]	D015	Toxaphene 2.6	[ ]	D027	p-dichlorbenzene 6.0	[ ]	D039	Tetrachloroethylene 6.0
[ ]	D016	2,4 D 10	[ ]	D028	1,2-dichloroethane 6.0	[ ]	D040	Trichlorethylene 6.0
[ ]	D017	2,4,5-TP Silvex 7.9	[ ]	D029	1,1-dichloroethylene 6.0	[ ]	D041	2,4,5-Trichlorophenol 7.4
[ ]	D018	Benzene 10	[ ]	D030	2,4-dinitrotoluene 140	[ ]	D042	2,4,6-Trichlorophenol 7.4
[ ]	D019	Carbon Tetrachloride 6.0	[ ]	D031	Heptachlor & epoxides 0.066	[ ]	D043	Vinyl Chloride 6.0
[ ]	D020	Chlordane 0.26	[ ]	D032	Hexachlorbenzene 10			
[ ]	D021	Chlorobenzene 6.0	[ ]	D033	Hexachlorobutadiene 5.6			
[ ]	D022	Chloroform 6.0	[ ]	D034	Hexachloroethane 30			
[ ]	D023	o-cresol 5.6	[ ]	D035	Methyl Ethyl Ketone 36			

F001-F005 Spent Solvents: concentrations expressed mg/kg (NON-WASTEWATER) **F003-F005 Non-Wastewater spent solvents expressed in mg/l (TCLP)**

[XXX]	Acetone 160	[ ]	Isobutyl Alcohol 170	[ ]	Carbon disulfide 4.8
[ ]	Benzene 10	[ ]	Methylene Chloride 30	[ ]	Cyclohexanone 0.75
[XXX]	N-butyl alcohol	[XXX]	Methyl Ethyl Ketone 36	[ ]	Methanol 0.75
[ ]	carbontetrachloride 6.0	[ ]	Methyl Isobutyl Ketone 33		
[ ]	chlorobenzene 6.0	[ ]	Nitrobenzene 14		
[ ]	o-cresol 5.6	[ ]	Pyridine 16		
[ ]	m-cresol 5.6	[ ]	Tetrachloroethylene 6.0		
[ ]	p-cresol 5.6	[XXX]	Toluene 10		
[ ]	Cresol mixed isomers 11.2	[ ]	111-Trichloroethane 6.0		
[ ]	O-Dichlorobenzene 6.0	[ ]	112-Trichloroethane 6.0		
[ ]	Ethyl Acetate 33	[ ]	112-Trichloro-122-trifluoroethane 30		
[ ]	Ethyl Benzene 10	[ ]	Trichloroethylene 6.0		
[ ]	Ethyl Ether 160	[ ]	Trichloromonofluoromethane 30		
		[ ]	Xylene (mixed isomers) 30		

Attachment 13 Page 11 of 32

4/13/2012

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Generator Name: Industrial Laminates - Norplex Inc. **Rineco Profile #** 0910-17386

Manifest Doc. #: 004680190FLE

f the specified treatment technology of "DEACT" and meet 268.48 Standard" is identified, then each underlying hazardous constituent present n waste at the point of generation that is at a level above the F039 constituent specific treatment standard must be listed. Please check the box next to each constituent present to note the constituent(s) that must be managed under 40 CFR268.7.

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	Check Here	mg/kg3		Check Here	mg/kg3
A2213		1.4	Chlordane (alpha & gamma isomers)		0.26
Acenaphthylene		3.4	p-Chloroaniline		16
Acenaphthene		3.4	Chlorobenzene		6.0
Acetone		160	Chlorobenzilate		NA
Acetonitrile		38	2-Chloro-1,3-butadiene		0.28
Acetophenone		9.7	Chlorodibromomethane		15
2-Acetylaminofluorene		140	Chloroethane		6.0
Acrolein		NA	bis (2-Chloroethoxy) methane		7.2
Acrylamide		23	bis (2-Chloroethyl) ether		6.0
Acrylonitrile		84	Chloroform		6.0
Aldicarb Sulfone		0.28	bis (2-Chloroisopropyl) ether		7.2
Aldrin		0.066	p-Chloro-m-cresol		14
4-Aminobiphenyl		NA	2-Chloroethyl Vinyl Ether		NA
Aniline		14	Chloromethane / Methyl Chloride		30
Anthracene		3.4	2-Chloronaphthalene		5.6
Aramite		NA	2-Chlorophenol		5.7
alpha-BHC		0.066	3-Chloropropylene		30
beta-BHC		0.066	Chrysene		3.4
delta-BHC		0.066	o-Cresol		5.6
gamma-BHC		0.066	m-Cresol		5.6
Barban		1.4	p-Cresol		5.6
Bendiocarb		1.4	m-Cumenyl Methylcarbamate		1.4
Bendiocarb Phenol		1.4	Cyclohexanone		0.75 mg/L TCLP
Benomyl		1.4	o,p'-DDD		0.087
Benzene		10	p,p'-DDD		0.087
Benz (a) anthracene		3.4	o,p'-DDE		0.087
Benzal Chloride		6.0	p,p'-DDE		0.087
Benzo (b) fluoranthene		6.8	o,p'-DDT		0.087
Benzo (k) fluoranthene		6.8	p,p'-DDT		0.087
Benzo (g,h,i) perylene		1.8	Dibenz (a,h) anthracene		8.2
Benzo (a) pyrene		3.4	Dibenz (a,e) pyrene		NA
Bromodichloromethane		15	1,2-Dibromo-3-chloropropane		15
Bromomethane / Methyl Bromide		15	1,2-Dibromoethane/Ethylene Dibromide		15
4-bromophenyl Phenyl Ether		15	Dibromomethane		15
N-butyl Alcohol		2.6	m-Dichlorobenzene		6.0
Butylate		1.4	o-Dichlorobenzene		6.0
Butyl Benzyl Phthalate		28	p-Dichlorobenzene		6.0
2-sec-Butyl-4,6-dinitrophenol/Dinoseb		2.5	Dichlorodifluoromethane		7.2
Carbaryl		0.14	1,1-Dichloroethane		6.0
Carbenzadim		1.4	1,2-Dichloroethane		6.0
Carbofuran		0.14	1,1-Dichloroethylene		6.0
Carbofuran Phenol		1.4	trans-1,2-Dichloroethylene		30
Carbon Disulfide		4.8 mg/L TCLP	2,4-Dichlorophenol		14
Carbon Tetrachloride		6.0	2,6-Dichlorophenol		14
Carbosulfan Disulf		1.4 Disulfi	2, 4-Dichlorophenoxyacetic Acid/2, 4-D		10

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**		**Check Here**	**mg/kg3**
1, 2-Dichloropropane		18	Hexachloropropylene		30
cis-1, 3-Dichloropropylene		18	Indeno (1,2,3-c,d) pyrene		3.4
trans-1, 3-Dichloropropylene		18	Iodomethane		65
Dieldrin		0.13	Isobutyl Alcohol		170
Diethylene Glycol, Dicarbamate		1.4	Isodrin		0.066
Diethyl Phthalate		28	Isolan		1.4
p-Dimethylaminoazobenzene		NA	Isosafrole		2.6
2-4-Dimethyl Phenol		14	Kepone		0.13
Dimethyl Phthalate		28	Methacrylonitrile		84
Dimetilan		1.4	Methanol		0.75 mg/L TCLP
Di-n-butyl Phthalate		28	Methapyrilene		1.5
1, 4-Dinitrobenzene		2.3	Methiocarb		1.4
4, 6-Dinitro-o-cresol		160	Methomyl		0.14
2, 4-Dinitrophenol		160	Methoxychlor		0.18
2, 4-Dinitrotoluene		140	3-Methylcholanthrene		15
2, 6-Dinitrotoluene		28	4, 4-Methylene bis (2-chloroaniline)		30
Di-n-octyl Phthalate		28	Methylene Chloride		30
Di-n-propylnitrosamine		14	Methyl Ethyl Ketone		36
1, 4-Dioxane		170	Methyl Isobutyl Ketone		33
Diphenylamine		13	Methyl Methacrylate		160
Diphenylnitrosamine		13	Methyl Methansulfonate		NA
1, 2-Diphenylhydrazine		NA	Methyl Parathion		4.6
Disulfoton		6.2	Metolcarb		1.4
Dithiocarbamates (total)		28	Mexacarbate		1.4
Endosulfan I		0.066	Molinate		1.4
Endosulfan II		0.13	Naphthalene		5.6
Endosulfan Sulfate		0.13	2-Naphthylamine		NA
Endrin		0.13	o-Nitroaniline		14
Endrin Aldehyde		0.13	p-Nitroaniline		28
EPTC		1.4	Nitrobenzene		14
Ethyl Acetate		33	5-Nitro-o-toluidine		28
Ethyl Benzene		10	o-Nitrophenol		13
Ethyl Cyanide/Propanenitrile		360	p-Nitrophenol		29
Ethyl Ether		160	N-Nitrosodiethylamine		28
bis (2-Ethylhexyl) Phthalate		28	N-Nitrosodimethylamine		2.3
Ethyl Methacrylate		160	N-Nitroso-di-n-butylamine		17
Ethylene Oxide		NA	N-Nitrosomethylethylamine		2.3
Famphur		15	N-Nitrosomorpholine		2.3
Fluoranthene		3.4	N-Nitrosopiperidine		35
Fluorene		3.4	N-Nitrosopyrrolidine		35
Formetanate Hydrochloride		1.4	Oxamyl		0.28
Formparanate		1.4	Parathion		4.6
Heptachlor		0.066	Total PCBs (Sum of all PCB Isomers, or all Arochlors)		10
Heptachlor Epoxide		0.066	Pebulate		1.4
Hexachlorobenzene		10	Pentachlorobenzene		10
Hexachlorobutadiene		5.6	PeCDDs (All Pentachlorodibenzo-p-dioxins)		0.001
Hexachlorocyclopentadiene		2.4	PeCDFs (All Pentachlorodibenzofurans)		0.001
HxCDDs (All Hexachlorodibenzo-p-dioxins)		0.001	Pentachloroethane		6.0
HxCDFs (All Hexachlorodibenzofurans)		0.001	Pentachloronitrobenzene		4.8
Hexachloroethane		30	Pentachlorophenol		7.4

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**	**II. Inorganic Constituents**	**Check Here**	**mg/kg3**
Phe[illegible]etin		16	Antimony		1.15 mg/l TCLP
Pl[illegible]hrene		5.6	Arsenic		5.0 mg/L TCLP
Phenol		6.2	Barium		21 mg/l TCLP
o-Phenylenediamine		5.6	Beryllium		1.22 mg/l TCLP
Phorate		4.6	Cadmium		0.11 mg/l TCLP
Phthalic Acid		28	Chromium (Total)		0.60 mg/l TCLP
Phthalic Anhydride		28	Cyanides (Total)		590
Physostigmine		1.4	Cyanides (Amenable)		30
Physostigmine Salicylate		1.4	Fluoride		NA
Promecarb		1.4	Lead		0.75 mg/l TCLP
Pronamide		1.5	Mercury-Nonwastewater from retort		0.20 mg/l TCLP
Propham		1.4	Mercury-All Others		0.025 mg/l TCLP
Propoxur		1.4	Nickel		11 mg/l TCLP
Prosulfocarb		1.4	Selenium		5.7 mg/l TCLP
Pyrene		8.2	Silver		0.14 mg/l TCLP
Pyridine		16	Sulfide		NA
Safrole		22	Thallium		0.20 mg/l TCLP
Silvex / 2,4,5-TP		7.9	Vanadium		1.6 mg/l TCLP
1,2,4,5-Tetrachlorobenzene		14	Zinc		4.3 mg/l TCLP
TCDDs (All Tetrachlorodibenzo-p-dioxins)		0.001			
TCDFs (All Tetrachlordibenzofurans)		0.001			
1,1,1,2-Tetrachloroethane		6.0			
1,1,2,2-Tetrachloroethane		6.0			
Tetrachloroethylene		6.0			
2,3,4,6-Tetrachlorophenol		7.4			
Thi[illegible]o		1.4			
Thiophanate-methyl		1.4			
Tirpate		0.28			
Toluene		10			
Toxaphene		2.6			
Triallate		1.4			
Tribromomethane/Bromoform		15			
2,4,6-Tribromophenol		7.4			
1,2,4-Trichlorobenzene		19			
1,1,1-Trichloroethane		6.0			
1,1,2-Trichloroethane		6.0			
Trichloroethylene		6.0			
Trichloromonofluoromethane		30			
2,4,5-Trichlorophenol		7.4			
2,4,6-Trichlorophenol		7.4			
2,4,5-Trichlorophenoxyacetic Acid/2,4,5-T		7.9			
1,2,3-Trichloropropane		30			
1,1,2-Trichloro-2,2,2-trifluoroethane		30			
Triethylamine		1.5			
Tris-(2,3-Dibromopropyl) Phosphate		0.10			
Vernolate		1.4			
Vinyl Chloride		6.0			
Xyle[illegible]um of o-,m-,p-xylene concetrations)		30			

RINECO LAND DISPOSAL RESTRICTIONS NOTIFICATION FORM

Generator: Industrial Laminates - Norplex Inc. **EPA ID #** IAD073489288

Pickup Date: 4/19/12 8:00 am **Manifest Doc. #** 004680190FLE

PA Codes D001 F003 F005 **Profile #** 0910-17387 **Line Item** 3.

EPA Waste Codes		Waste Description & Treatment/ Regulatory Subcategory	NON-WASTEWATER	Concentration in mg/l or Technology Code
XXX	D001	Ignitable characteristic wastes, except for 261.21(a)(1) High TOC subcategory that are managed Non-CWA/nonCWA equivalent/non class I SDWA systems.		DEACT and meet 268.48 standards or RORGS; or CMBST
	D001	High TOC Ignitable characteristic liquids subcategroy based on 40 CFR 261.21(a)(1)-greater than or equal to 10% TOC.		RORGS; or CMBST; or POLYM
	D002	Corrosive characteristic wastes that are managed In non-CWA non CWA equivalent, or class / SDWA systems.		DEACT & meet 268.48 standards

D004-D011 Heavy Metals Expressed in Concentrations of mg/l (TCLP) and must meet 268.48 Standards. (NON-WASTEWATER)

	D004	Arsenic 5.0		D008	Lead 0.75
	D005	Barium 21		D009	Mercury 0.20 low mercury subcategory
	D006	Cadmium 0.11		D010	Selenium 5.7
	D007	Chromium 0.60		D011	Silver 0.14

D012-D043 Concentrations Expressed in mg/kg, and Must Meet 268.48 Standards. (NON-WASTEWATER)

	D012	Endrin 0.13		D024	m-cresol 5.6		D036	Nitorbenzene 14
	D013	Lindane 0.066		D025	p-cresol 5.6		D037	Pentachlorophenol 7.4
	D014	Methoxychlor 0.18		D026	Cresol Mixed Isomer 11.2		D038	Pyridine 16
	D015	Toxaphene 2.6		D027	p-dichlorbenzene 6.0		D039	Tetrachloroethylene 6.0
	D016	2,4 D 10		D028	1,2-dichloroethane 6.0		D040	Trichlorethylene 6.0
	D017	2,4,5-TP Silvex 7.9		D029	1,1-dichloroethylene 6.0		D041	2,4,5-Trichlorophenol 7.4
	D018	Benzene 10		D030	2,4-dinitrotoluene 140		D042	2,4,6-Trichlorophenol 7.4
	D019	Carbon Tetrachloride 6.0		D031	Heptachlor & epoxides 0.066		D043	Vinyl Chloride 6.0
	D020	Chlordane 0.26		D032	Hexachlorbenzene 10			
	D021	Chlorobenzene 6.0		D033	Hexachlorobutadiene 5.6			
	D022	Chloroform 6.0		D034	Hexachloroethane 30			
	D023	o-cresol 5.6		D035	Methyl Ethyl Ketone 36			

F001-F005 Spent Solvents: concentrations expressed mg/kg (NON-WASTEWATER) **F003-F005 Non-Wastewater spent solvents expressed in mg/l (TCLP)**

XXX	Acetone 160		Isobutyl Alcohol 170		Carbon disulfide 4.8
	Benzene 10		Methylene Chloride 30		Cyclohexanone 0.75
	N-butyl alcohol	XXX	Methyl Ethyl Ketone 36		Methanol 0.75
	carbontetrachloride 6.0		Methyl Isobutyl Ketone 33		
	chlorobenzene 6.0		Nitrobenzene 14		
	o-cresol 5.6		Pyridine 16		
	m-cresol 5.6		Tetrachloroethylene 6.0		
	p-cresol 5.6	XXX	Toluene 10		
	Cresol mixed isomers 11.2		111-Trichloroethane 6.0		
	O-Dichlorobenzene 6.0		112-Trichloroethane 6.0		
	Ethyl Acetate 33		112-Trichloro-122-trifluoroethane 30		
	Ethyl Benzene 10		Trichloroethylene 6.0		
	Ethyl Ether 160		Trichloromonofluoromethane 30		
			Xylene (mixed isomers) 30		

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Generator Name: Industrial Laminates - Norplex Inc. **Rineco Profile #** 0910-17387

Manifest Doc. #: 004680190FLE

f ' specified treatment technology of "DEACT" and meet 268.48 Standard" is identified, then each underlying hazardous constituent present n . waste at the point of generation that is at a level above the F039 constituent specific treatment standard must be listed. Please check the box next to each constituent present to note the constituent(s) that must be managed under 40 CFR268.7.

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	Check Here	mg/kg3		Check Here	mg/kg3
A2213		1.4	Chlordane (alpha & gamma isomers)		0.26
Acenaphthylene		3.4	p-Chloroaniline		16
Acenaphthene		3.4	Chlorobenzene		6.0
Acetone		160	Chlorobenzilate		NA
Acetonitrile		38	2-Chloro-1,3-butadiene		0.28
Acetophenone		9.7	Chlorodibromomethane		15
2-Acetylaminofluorene		140	Chloroethane		6.0
Acrolein		NA	bis (2-Chloroethoxy) methane		7.2
Acrylamide		23	bis (2-Chloroethyl) ether		6.0
Acrylonitrile		84	Chloroform		6.0
Aldicarb Sulfone		0.28	bis (2-Chloroisopropyl) ether		7.2
Aldrin		0.066	p-Chloro-m-cresol		14
4-Aminobiphenyl		NA	2-Chloroethyl Vinyl Ether		NA
Aniline		14	Chloromethane / Methyl Chloride		30
Anthracene		3.4	2-Chloronaphthalene		5.6
Aramite		NA	2-Chlorophenol		5.7
alph HC		0.066	3-Chloropropylene		30
bet C		0.066	Chrysene		3.4
delta-BHC		0.066	o-Cresol		5.6
gamma-BHC		0.066	m-Cresol		5.6
Barban		1.4	p-Cresol		5.6
Bendiocarb		1.4	m-Cumenyl Methylcarbamate		1.4
Bendiocarb Phenol		1.4	Cyclohexanone		0.75 mg/L TCLP
Benomyl		1.4	o,p'-DDD		0.087
Benzene		10	p,p'-DDD		0.087
Benz (a) anthracene		3.4	o,p'-DDE		0.087
Benzal Chloride		6.0	p,p'-DDE		0.087
Benzo (b) fluoranthene		6.8	o,p'-DDT		0.087
Benzo (k) fluoranthene		6.8	p,p'-DDT		0.087
Benzo (g,h,i) perylene		1.8	Dibenz (a,h) anthracene		8.2
Benzo (a) pyrene		3.4	Dibenz (a,e) pyrene		NA
Bromodichloromethane		15	1,2-Dibromo-3-chloropropane		15
Bromomethane / Methyl Bromide		15	1,2-Dibromoethane/Ethylene Dibromide		15
4-bromophenyl Phenyl Ether		15	Dibromomethane		15
N-butyl Alcohol		2.6	m-Dichlorobenzene		6.0
Butylate		1.4	o-Dichlorobenzene		6.0
Butyl Benzyl Phthalate		28	p-Dichlorobenzene		6.0
2-sec-Butyl-4,6-dinitrophenol/Dinoseb		2.5	Dichlorodifluoromethane		7.2
Carbaryl		0.14	1,1-Dichloroethane		6.0
Carbenzadim		1.4	1,2-Dichloroethane		6.0
Carbofuran		0.14	1,1-Dichloroethylene		6.0
Carbofuran Phenol		1.4	trans-1,2-Dichloroethylene		30
Carbon Disulfide		4.8 mg/L TCLP	2,4-Dichlorophenol		14
Carb etrachloride		6.0	2,6-Dichlorophenol		14
Carbosulfan Disulf		1.4 Disulfi	2, 4-Dichlorophenoxyacetic Acid/2, 4-D		10

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**		**Check Here**	**mg/kg3**
1, [illegible]hloropropane		18	Hexachloropropylene		30
cis- [illegible]-Dichloropropylene		18	Indeno (1,2,3-c,d) pyrene		3.4
trans-1, 3-Dichloropropylene		18	Iodomethane		65
Dieldrin		0.13	Isobutyl Alcohol		170
Diethylene Glycol, Dicarbamate		1.4	Isodrin		0.066
Diethyl Phthalate		28	Isolan		1.4
p-Dimethylaminoazobenzene		NA	Isosafrole		2.6
2-4-Dimethyl Phenol		14	Kepone		0.13
Dimethyl Phthalate		28	Methacrylonitrile		84
Dimetilan		1.4	Methanol		0.75 mg/L TCLP
Di-n-butyl Phthalate		28	Methapyrilene		1.5
1, 4-Dinitrobenzene		2.3	Methiocarb		1.4
4, 6-Dinitro-o-cresol		160	Methomyl		0.14
2, 4-Dinitrophenol		160	Methoxychlor		0.18
2, 4-Dinitrotoluene		140	3-Methylcholanthrene		15
2, 6-Dinitrotoluene		28	4, 4-Methylene bis (2-chloroaniline)		30
Di-n-octyl Phthalate		28	Methylene Chloride		30
Di-n-propylnitrosamine		14	Methyl Ethyl Ketone		36
1, 4-Dioxane		170	Methyl Isobutyl Ketone		33
Diphenylamine		13	Methyl Methacrylate		160
Diphenylnitrosamine		13	Methyl Methansulfonate		NA
1, 2-Diphenylhydrazine		NA	Methyl Parathion		4.6
Disulfoton		6.2	Metolcarb		1.4
Dith[illegible]bamates (total)		28	Mexacarbate		1.4
Endo[illegible]an I		0.066	Molinate		1.4
Endosulfan II		0.13	Naphthalene		5.6
Endosulfan Sulfate		0.13	2-Naphthylamine		NA
Endrin		0.13	o-Nitroaniline		14
Endrin Aldehyde		0.13	p-Nitroaniline		28
EPTC		1.4	Nitrobenzene		14
Ethyl Acetate		33	5-Nitro-o-toluidine		28
Ethyl Benzene		10	o-Nitrophenol		13
Ethyl Cyanide/Propanenitrile		360	p-Nitrophenol		29
Ethyl Ether		160	N-Nitrosodiethylamine		28
bis (2-Ethylhexyl) Phthalate		28	N-Nitrosodimethylamine		2.3
Ethyl Methacrylate		160	N-Nitroso-di-n-butylamine		17
Ethylene Oxide		NA	N-Nitrosomethylethylamine		2.3
famphur		15	N-Nitrosomorpholine		2.3
fluoranthene		3.4	N-Nitrosopiperidine		35
fluorene		3.4	N-Nitrosopyrrolidine		35
formetanate Hydrochloride		1.4	Oxamyl		0.28
formparanate		1.4	Parathion		4.6
heptachlor		0.066	Total PCBs (Sum of all PCB Isomers, or all Arochlors)		10
heptachlor Epoxide		0.066	Pebulate		1.4
hexachlorobenzene		10	Pentachlorobenzene		10
hexachlorobutadiene		5.6	PeCDDs (All Pentachlorodibenzo-p-dioxins)		0.001
hexachlorocyclopentadiene		2.4	PeCDFs (All Pentachlorodibenzofurans)		0.001
xCD[illegible] (All Hexachlorodibenzo-p-dioxins)		0.001	Pentachloroethane		6.0
xC[illegible] All Hexachlorodibenzofurans)		0.001	Pentachloronitrobenzene		4.8
hexachloroethane		30	Pentachlorophenol		7.4

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**	**II. Inorganic Constituents**	**Check Here**	**mg/kg3**
Pt etin		16	Antimony		1.15 mg/l TCLP
Phe. .nthrene		5.6	Arsenic		5.0 mg/L TCLP
Phenol		6.2	Barium		21 mg/l TCLP
o-Phenylenediamine		5.6	Beryllium		1.22 mg/l TCLP
Phorate		4.6	Cadmium		0.11 mg/l TCLP
Phthalic Acid		28	Chromium (Total)		0.60 mg/l TCLP
Phthalic Anhydride		28	Cyanides (Total)		590
Physostigmine		1.4	Cyanides (Amenable)		30
Physostigmine Salicylate		1.4	Fluoride		NA
Promecarb		1.4	Lead		0.75 mg/l TCLP
Pronamide		1.5	Mercury-Nonwastewater from retort		0.20 mg/l TCLP
Propham		1.4	Mercury-All Others		0.025 mg/l TCLP
Propoxur		1.4	Nickel		11 mg/l TCLP
Prosulfocarb		1.4	Selenium		5.7 mg/l TCLP
Pyrene		8.2	Silver		0.14 mg/l TCLP
Pyridine		16	Sulfide		NA
Safrole		22	Thallium		0.20 mg/l TCLP
Silvex / 2,4,5-TP		7.9	Vanadium		1.6 mg/l TCLP
1,2,4,5-Tetrachlorobenzene		14	Zinc		4.3 mg/l TCLP
TCDDs (All Tetrachlorodibenzo-p-dioxins)		0.001			
TCDFs (All Tetrachlordibenzofurans)		0.001			
1,1,1,2-Tetrachloroethane		6.0			
1,1,2,2-Tetrachloroethane		6.0			
Tetrachloroethylene		6.0			
2,3 Tetrachlorophenol		7.4			
Thi .rb		1.4			
Thiophanate-methyl		1.4			
Tirpate		0.28			
Toluene		10			
Toxaphene		2.6			
Triallate		1.4			
Tribromomethane/Bromoform		15			
2,4,6-Tribromophenol		7.4			
1,2,4-Trichlorobenzene		19			
1,1,1-Trichloroethane		6.0			
1,1,2-Trichloroethane		6.0			
Trichloroethylene		6.0			
Trichloromonofluoromethane		30			
2,4,5-Trichlorophenol		7.4			
2,4,6-Trichlorophenol		7.4			
2,4,5-Trichlorophenoxyacetic Acid/2,4,5-T		7.9			
1,2,3-Trichloropropane		30			
1,1,2-Trichloro-2,2,2-trifluoroethane		30			
Triethylamine		1.5			
ris-(2,3-Dibromopropyl) Phosphate		0.10			
Vernolate		1.4			
Vinyl Chloride		6.0			
Xyl sum of o-,m-,p-xylene concetrations)		30			

RINECO LAND DISPOSAL RESTRICTIONS NOTIFICATION FORM

Generator: Industrial Laminates - Norplex Inc. **EPA ID #** IAD073489288

Pickup Date: 4/19/12 8:00 am **Manifest Doc. #** 004680190FLE

'A Codes D001 F003 F005 **Profile #** 0910-17389 **Line Item** 4.

EPA Waste Codes		Waste Description & Treatment/ Regulatory Subcategory	NON-WASTEWATER	Concentration in mg/1 or Technology Code
XXX	D001	Ignitable characteristic wastes, except for 261.21(a)(1) High TOC subcategory that are managed Non-CWA/nonCWA equivalent/non class I SDWA systems.		DEACT and meet 268.48 standards or RORGS; or CMBST
	D001	High TOC Ignitable characteristic liquids subcategroy based on 40 CFR 261.21(a)(1)-greater than or equal to 10% TOC.		RORGS; or CMBST; or POLYM
	D002	Corrosive characteristic wastes that are managed in non-CWA non CWA equivalent, or class / SDWA systems.		DEACT & meet 268.48 standards

D004-D011 Heavy Metals Expressed in Concentrations of mg/l (TCLP) and must meet 268.48 Standards. (NON-WASTEWATER)

	D004	Arsenic 5.0		D008	Lead 0.75
	D005	Barium 21		D009	Mercury 0.20 low mercury subcategory
	D006	Cadmium 0.11		D010	Selenium 5.7
	D007	Chromium 0.60		D011	Silver 0.14

D012-D043 Concentrations Expressed in mg/kg, and Must Meet 268.48 Standards. (NON-WASTEWATER)

	D012	Endrin 0.13		D024	m-cresol 5.6		D036	Nitorbenzene 14
	D013	Lindane 0.066		D025	p-cresol 5.6		D037	Pentachlorophenol 7.4
	D014	Methoxychlor 0.18		D026	Cresol Mixed Isomer 11.2		D038	Pyridine 16
	D015	Toxaphene 2.6		D027	p-dichlorbenzene 6.0		D039	Tetrachloroethylene 6.0
	D016	2,4 D 10		D028	1,2-dichloroethane 6.0		D040	Trichlorethylene 6.0
	D017	2,4,5-TP Silvex 7.9		D029	1,1-dichloroethylene 6.0		D041	2,4,5-Trichlorophenol 7.4
	D018	Benzene 10		D030	2,4-dinitrotoluene 140		D042	2,4,6-Trichlorophenol 7.4
	D019	Carbon Tetrachloride 6.0		D031	Heptachlor & epoxides 0.066		D043	Vinyl Chloride 6.0
	D020	Chlordane 0.26		D032	Hexachlorbenzene 10			
	D021	Chlorobenzene 6.0		D033	Hexachlorobutadiene 5.6			
	D022	Chloroform 6.0		D034	Hexachloroethane 30			
	D023	o-cresol 5.6		D035	Methyl Ethyl Ketone 36			

F001-F005 Spent Solvents: concentrations expressed mg/kg (NON-WASTEWATER) **F003-F005 Non-Wastewater spent solvents expressed in mg/l (TCLP)**

XXX	Acetone 160		Isobutyl Alcohol 170		Carbon disulfide 4.8
	Benzene 10		Methylene Chloride 30		Cyclohexanone 0.75
	N-butyl alcohol		Methyl Ethyl Ketone 36		Methanol 0.75
	carbontetrachloride 6.0		Methyl Isobutyl Ketone 33		
	chlorobenzene 6.0		Nitrobenzene 14		
	o-cresol 5.6		Pyridine 16		
	m-cresol 5.6		Tetrachloroethylene 6.0		
	p-cresol 5.6	XXX	Toluene 10		
	Cresol mixed isomers 11.2		111-Trichloroethane 6.0		
	O-Dichlorobenzene 6.0		112-Trichloroethane 6.0		
	Ethyl Acetate 33		112-Trichloro-122-trifluoroethane 30		
	Ethyl Benzene 10		Trichloroethylene 6.0		
	Ethyl Ether 160		Trichloromonofluoromethane 30		
			Xylene (mixed isomers) 30		

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Generator Name: Industrial Laminates - Norplex Inc. **Rineco Profile #** 0910-17389

Manifest Doc. #: 004680190FLE

f th specified treatment technology of "DEACT" and meet 268.48 Standard" is identified, then each underlying hazardous constituent present n Waste at the point of generation that is at a level above the F039 constituent specific treatment standard must be listed. Please check the box next to each constituent present to note the constituent(s) that must be managed under 40 CFR268.7.

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	Check Here	mg/kg3		Check Here	mg/kg3
A2213		1.4	Chlordane (alpha & gamma isomers)		0.26
Acenaphthylene		3.4	p-Chloroaniline		16
Acenaphthene		3.4	Chlorobenzene		6.0
Acetone		160	Chlorobenzilate		NA
Acetonitrile		38	2-Chloro-1,3-butadiene		0.28
Acetophenone		9.7	Chlorodibromomethane		15
2-Acetylaminofluorene		140	Chloroethane		6.0
Acrolein		NA	bis (2-Chloroethoxy) methane		7.2
Acrylamide		23	bis (2-Chloroethyl) ether		6.0
Acrylonitrile		84	Chloroform		6.0
Aldicarb Sulfone		0.28	bis (2-Chloroisopropyl) ether		7.2
Aldrin		0.066	p-Chloro-m-cresol		14
4-Aminobiphenyl		NA	2-Chloroethyl Vinyl Ether		NA
Aniline		14	Chloromethane / Methyl Chloride		30
Anthracene		3.4	2-Chloronaphthalene		5.6
Aramite		NA	2-Chlorophenol		5.7
alpha-BHC		0.066	3-Chloropropylene		30
beta-		0.066	Chrysene		3.4
delta-BHC		0.066	o-Cresol		5.6
gamma-BHC		0.066	m-Cresol		5.6
Barban		1.4	p-Cresol		5.6
Bendiocarb		1.4	m-Cumenyl Methylcarbamate		1.4
Bendiocarb Phenol		1.4	Cyclohexanone		0.75 mg/L TCLP
Benomyl		1.4	o,p'-DDD		0.087
Benzene		10	p,p'-DDD		0.087
Benz (a) anthracene		3.4	o,p'-DDE		0.087
Benzal Chloride		6.0	p,p'-DDE		0.087
Benzo (b) fluoranthene		6.8	o,p'-DDT		0.087
Benzo (k) fluoranthene		6.8	p,p'-DDT		0.087
Benzo (g,h,i) perylene		1.8	Dibenz (a,h) anthracene		8.2
Benzo (a) pyrene		3.4	Dibenz (a,e) pyrene		NA
Bromodichloromethane		15	1,2-Dibromo-3-chloropropane		15
Bromomethane / Methyl Bromide		15	1,2-Dibromoethane/Ethylene Dibromide		15
4-bromophenyl Phenyl Ether		15	Dibromomethane		15
N-butyl Alcohol		2.6	m-Dichlorobenzene		6.0
Butylate		1.4	o-Dichlorobenzene		6.0
Butyl Benzyl Phthalate		28	p-Dichlorobenzene		6.0
2-sec-Butyl-4,6-dinitrophenol/Dinoseb		2.5	Dichlorodifluoromethane		7.2
Carbaryl		0.14	1,1-Dichloroethane		6.0
Carbenzadim		1.4	1,2-Dichloroethane		6.0
Carbofuran		0.14	1,1-Dichloroethylene		6.0
Carbofuran Phenol		1.4	trans-1,2-Dichloroethylene		30
Carbon Disulfide		4.8 mg/L TCLP	2,4-Dichlorophenol		14
Carb trachloride		6.0	2,6-Dichlorophenol		14
Carbosulfan Disulf		1.4 Disulfi	2, 4-Dichlorophenoxyacetic Acid/2, 4-D		10

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**		**Check Here**	**mg/kg3**
1, 2-Dichloropropane		18	Hexachloropropylene		30
cis Dichloropropylene		18	Indeno (1,2,3-c,d) pyrene		3.4
trans-1, 3-Dichloropropylene		18	Iodomethane		65
Dieldrin		0.13	Isobutyl Alcohol		170
Diethylene Glycol, Dicarbamate		1.4	Isodrin		0.066
Diethyl Phthalate		28	Isolan		1.4
p-Dimethylaminoazobenzene		NA	Isosafrole		2.6
2-4-Dimethyl Phenol		14	Kepone		0.13
Dimethyl Phthalate		28	Methacrylonitrile		84
Dimetilan		1.4	Methanol		0.75 mg/L TCLP
Di-n-butyl Phthalate		28	Methapyrilene		1.5
1, 4-Dinitrobenzene		2.3	Methiocarb		1.4
4, 6-Dinitro-o-cresol		160	Methomyl		0.14
2, 4-Dinitrophenol		160	Methoxychlor		0.18
2, 4-Dinitrotoluene		140	3-Methylcholanthrene		15
2, 6-Dinitrotoluene		28	4, 4-Methylene bis (2-chloroaniline)		30
Di-n-octyl Phthalate		28	Methylene Chloride		30
Di-n-propylnitrosamine		14	Methyl Ethyl Ketone		36
1, 4-Dioxane		170	Methyl Isobutyl Ketone		33
Diphenylamine		13	Methyl Methacrylate		160
Diphenylnitrosamine		13	Methyl Methansulfonate		NA
1, 2-Diphenylhydrazine		NA	Methyl Parathion		4.6
Disulfoton		6.2	Metolcarb		1.4
Dithiocarbamates (total)		28	Mexacarbate		1.4
Endosulfan I		0.066	Molinate		1.4
Endosulfan II		0.13	Naphthalene		5.6
Endosulfan Sulfate		0.13	2-Naphthylamine		NA
Endrin		0.13	o-Nitroaniline		14
Endrin Aldehyde		0.13	p-Nitroaniline		28
EPTC		1.4	Nitrobenzene		14
Ethyl Acetate		33	5-Nitro-o-toluidine		28
Ethyl Benzene		10	o-Nitrophenol		13
Ethyl Cyanide/Propanenitrile		360	p-Nitrophenol		29
Ethyl Ether		160	N-Nitrosodiethylamine		28
bis (2-Ethylhexyl) Phthalate		28	N-Nitrosodimethylamine		2.3
Ethyl Methacrylate		160	N-Nitroso-di-n-butylamine		17
Ethylene Oxide		NA	N-Nitrosomethylethylamine		2.3
Famphur		15	N-Nitrosomorpholine		2.3
Fluoranthene		3.4	N-Nitrosopiperidine		35
Fluorene		3.4	N-Nitrosopyrrolidine		35
Formetanate Hydrochloride		1.4	Oxamyl		0.28
Formparanate		1.4	Parathion		4.6
Heptachlor		0.066	Total PCBs (Sum of all PCB Isomers, or all Arochlors)		10
Heptachlor Epoxide		0.066	Pebulate		1.4
Hexachlorobenzene		10	Pentachlorobenzene		10
Hexachlorobutadiene		5.6	PeCDDs (All Pentachlorodibenzo-p-dioxins)		0.001
Hexachlorocyclopentadiene		2.4	PeCDFs (All Pentachlorodibenzofurans)		0.001
HxCDDs (All Hexachlorodibenzo-p-dioxins)		0.001	Pentachloroethane		6.0
HxCDFs (All Hexachlorodibenzofurans)		0.001	Pentachloronitrobenzene		4.8
Hexachloroethane		30	Pentachlorophenol		7.4

268.48 UNIVERSAL TREATMENT STANDARDS TABLE FOR UNDERLYING HAZARDOUS CONSTITUENTS

Constituent	Present	NWW	Constituent	Present	NWW
I. Organic Constituents	**Check Here**	**mg/kg3**	**II. Inorganic Constituents**	**Check Here**	**mg/kg3**
Phenacetin		16	Antimony		1.15 mg/l TCLP
Phenanthrene		5.6	Arsenic		5.0 mg/L TCLP
Phenol		6.2	Barium		21 mg/l TCLP
o-Phenylenediamine		5.6	Beryllium		1.22 mg/l TCLP
Phorate		4.6	Cadmium		0.11 mg/l TCLP
Phthalic Acid		28	Chromium (Total)		0.60 mg/l TCLP
Phthalic Anhydride		28	Cyanides (Total)		590
Physostigmine		1.4	Cyanides (Amenable)		30
Physostigmine Salicylate		1.4	Fluoride		NA
Promecarb		1.4	Lead		0.75 mg/l TCLP
Pronamide		1.5	Mercury-Nonwastewater from retort		0.20 mg/l TCLP
Propham		1.4	Mercury-All Others		0.025 mg/l TCLP
Propoxur		1.4	Nickel		11 mg/l TCLP
Prosulfocarb		1.4	Selenium		5.7 mg/l TCLP
Pyrene		8.2	Silver		0.14 mg/l TCLP
Pyridine		16	Sulfide		NA
Safrole		22	Thallium		0.20 mg/l TCLP
Silvex / 2,4,5-TP		7.9	Vanadium		1.6 mg/l TCLP
1,2,4,5-Tetrachlorobenzene		14	Zinc		4.3 mg/l TCLP
TCDDs (All Tetrachlorodibenzo-p-dioxins)		0.001			
TCDFs (All Tetrachlordibenzofurans)		0.001			
1,1,1,2-Tetrachloroethane		6.0			
1,1,2,2-Tetrachloroethane		6.0			
Tetrachloroethylene		6.0			
2,3,4,6-Tetrachlorophenol		7.4			
Thiram		1.4			
Thiophanate-methyl		1.4			
Tirpate		0.28			
Toluene		10			
Toxaphene		2.6			
Triallate		1.4			
Tribromomethane/Bromoform		15			
2,4,6-Tribromophenol		7.4			
1,2,4-Trichlorobenzene		19			
1,1,1-Trichloroethane		6.0			
1,1,2-Trichloroethane		6.0			
Trichloroethylene		6.0			
Trichloromonofluoromethane		30			
2,4,5-Trichlorophenol		7.4			
2,4,6-Trichlorophenol		7.4			
2,4,5-Trichlorophenoxyacetic Acid/2,4,5-T		7.9			
1,2,3-Trichloropropane		30			
1,1,2-Trichloro-2,2,2-trifluoroethane		30			
Triethylamine		1.5			
Tris-(2,3-Dibromopropyl) Phosphate		0.10			
Vernolate		1.4			
Vinyl Chloride		6.0			
Xylene (sum of o-,m-,p-xylene concetrations)		30			

B221246 H103023 66474D

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
IAD073489288	1	(877) 818-0087	000550565 VES

GENERATOR

5. Generator's Name and Mailing Address
INDUSTRIAL LMNTS NORPLEX INC
685 LYBRAND DR
PO BOX 977
POSTVILLE, IA 52162-0977
Generator's Phone: 563 864-4235

Generator's Site Address (if different than mailing address)
INDUSTRIAL LMNTS NORPLEX INC
685 LYBRAND DR
POSTVILLE, IA 52162-0977

6. Transporter 1 Company Name: VEOLIA ES TECHNICAL SOLUTIONS — U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
VEOLIA ES TECHNICAL SOLUTIONS
HIGHWAY 73
3.5 MILES W. OF TAYLOR'S BAYOU
PORT ARTHUR, TX 77640
Facility's Phone: 409 736-2821
U.S. EPA ID Number: TXD000838896

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN1993, WASTE FLAMMABLE LIQUIDS, n.o.s., (METHANOL, METHYL ETHYL KETONE), 3, II, RQ (D001,F003,F005)	001	TT	7,705	P	F003 D001 D007 F005 OUTS101H
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: ER Service Contracted by VESTS -|- 1) ERG:128 W:587446 A:PTA587446

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. NOV 09 2011 09

Generator's/Offeror's Printed/Typed Name: Tim Delaney — Signature — Month 11 Day 7 Year 11

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: DENNIS SMITH — Signature: Dennis Smith — Month 11 Day 7 Year 11

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Attachment 13 Page 23 of 32

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H040			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Josette MacFarland — Signature: Josette MacFarland — Month 11 Day 09 Year 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-003

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: IAD073491288
2. Page 1 of: 1
3. Emergency Response Phone: (877) 818-0087
4. Manifest Tracking Number: 000550565 VES

GENERATOR

5. Generator's Name and Mailing Address:
INDUSTRIAL LIMITS NORPLEX INC
665 LYBRAND DR
PO BOX 67
POSTVILLE IA 52162-0067
Generator's Phone: 563 864-7695

Generator's Site Address (if different than mailing address):
INDUSTRIAL LIMITS NORPLEX INC
665 LYBRAND DR
POSTVILLE IA 52162-0067

6. Transporter 1 Company Name: VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD986061368

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: VEOLIA ES TECHNICAL SOLUTIONS
HIGHWAY 73
3.5 MILES W OF TAYLORS HAVEN
PORT ARTHUR, TX 77640
Facility's Phone: 409 736-2431
U.S. EPA ID Number: TXD000838996

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN1993, WASTE FLAMMABLE LIQUIDS, n.o.s. (METHANOL, METHYL ETHYL KETONE) 3, II, RQ (D001, F003, F005)	001	TT	1145	P	F003 D001 D007 F005 D018
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: EM Service Contracted by VEOLIS + 1) EPA# 128 W-587446 A PTA587443

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible] Signature: [signature] Month: 11 Day: 7 Year: 11

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: DENNIS SMITH Signature: [signature] Month: 11 Day: 7 Year: 11

Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number:

Attachment 13 Page 24 of 32

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Signature: Month: Day: Year:

Land Disposal Restriction Notification Form

Generator Name **INDUSTRIAL LMNTS NORPLEX INC**

EPA ID Number **IAD073489288** Manifest **000550565VES**

This notice is being provided in accordance with 40 CFR 268.7 to inform you that this shipment contains waste restricted from land disposal by the USEPA under the land disposal restriction program. Identified below for each container is the designation of the waste as a wastewater or non-wastewater, the Clean Water Act (CWA) permit status associated with the treatment/disposal facility, applicable waste codes and any corresponding subcategories, list of any F001-F005 solvent constituents that are present in the waste, and any underlying hazardous constituents (UHC) that are present.

Container Number: **WQ-1444217000-001 (1/ 1)**

WIP / Approval Code:	**587446 / PTA587446**
Form Designation / CWA Status:	**Non-Wastewater / Non-CWA**
Waste Codes (Subcategories):	**D001 (IGNITABLE CHARACTERISTIC WASTE, LIQUIDS >= 10% TOC PER 261.2 1(a)(1)), D007, D008 (NONE), F003 (CONTAINS 1 OR MORE OF THE FOLLOWING: CARBON DISULFIDE, CYCLO HEXANONE &/OR METHANOL AS THE ONLY F-LISTED SOLVENT), F005 (NONE)**
Constituents (F001 - F005):	**DISPOSAL SITE MONITORS FOR ALL CONSTITUENTS**
UHCs Present:	**PHENOL, SOLID**
Treatment Requirements:	**Restricted waste requires treatment to applicable standards.**
Additional Notices:	

Signature _____

Title Mfg. Engineer Date 11-7-2011

Transportation Activity Report

JOB NO: **1444217000** WO NO: **1444217000**
BILL DOC NO **WQ11021704**
GENERATOR NO **479047** EPA ID: **IAD073489288**

BILL TO: **HONEYWELL INTERNATIONAL**
101 COLUMBIA ROAD
MORRISTOWN, NJ 07962
(480) 592-2047

JOB SITE: **INDUSTRIAL LMNTS NORPLEX INC**
665 LYBRAND DR
POSTVILLE, IA 52162-0977
(563) 864-4235

CONTACT: **MANNY VAZQUEZ**

CONTACT: **TIMOTHY J. DELANEY**

MANIFEST NUMBER(S):
000550565VES

CUSTOMER P.O. NUMBER	PROJECT NUMBER	SHIP DATE	TERR.
		11/07/2011	W34

DESCRIPTION	# CONT.	CONT./CODE	QTY	UOM	PG/LN	WASTE AREA
Manifest # 000550565VES WIP 587446 / Approval PTA587446 CONTAMINATED GROUNDWATER				P	1 / 1	
Misc. - PICK-UP FEE		3182	1	EACH		
lisc. - FUEL SURCHARGE		3400	1	PERCNT		

Total Hours: **0**

TOTAL LOADING DEMURRAGE (HRS)	COMMENTS	TOTAL UNLOADING DEMURRAGE (HRS)
START TIME: 08:45 Am	UNIT IN #: H03077	START TIME:
END TIME: 09:45 Am	UNIT OUT #: H03077	END TIME:
TOTAL (HRS): 1	WASHOUT: YES / NO	TOTAL (HRS):
	USED: 0 / 1 / 2 / 3 LINERS	

	SIGNATURES	DATES
CUSTOMER		11/7/11
DRIVER	Dennis Smith	11/7/11

COMMENTS OR DELAY EXPLANATIONS:

Veolia Environmental Solutions is permitted for and has capacity to accept waste listed above in container quantities.

8-19-2011 3½ 55Gal Drums Well Water

Sent out 6 totes + 11½ 55Gals on Monday 8-29-2011 18,784# LB
or 2,255 Gal

Well Water	Gals	Date
Well Water	275	8-30-2011
Well Water	275	9-13-2011
Well Water	250	9-28-2011
Well Water	125	10-14-2011

925 Gal
or 7,705 # NET

Sent Monday 11-7-2011

7154

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: IAD073489288
2. Page 1 of 1
3. Emergency Response Phone: 1-800-468-1760
4. Manifest Tracking Number: 002816911 SKS

5. Generator's Name and Mailing Address:
INDUSTRIAL LAMINATES/NORP
665 LYBRAND ST PO BOX 977
POSTVILLE IA 52162-0370
Generator's Phone: 563-864-7321

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC. — U.S. EPA ID Number: TXR000050930

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: SAFETY-KLEEN SYSTEMS, INC.
3035 WEST 73RD STREET
DAVENPORT, IA
Facility's Phone: 563-386-3024
U.S. EPA ID Number

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. OILY WATER (NOT USDOT OR USEPA HAZARDOUS MATERIAL)	001	TT	633	G	NONE
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: SK SHIP# ~~[illegible]~~ 2066129168 894449 CSG:
24 HR EMERGENCY #1-800-468-1760 (SAFETY-KLEEN -- CONTRACT #94138)
SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Deanna Giancaspro — Signature: [signature] — Month 03 Day 16 Year 12

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Brian Hill — Signature: [signature] — Month 03 Day 16 Year 12
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

Attachment 13 Page 28 of 32

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Kennie Nickelson — Signature: [signature] — Month 03 Day 16 Year 12

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.
1)5776/3320038

safety-kleen®

SAFETY-KLEEN SYSTEMS, INC
5360 LEGACY DRIVE
PLANO, TX 75024

DUNS NO: 05-397-6551
FED ID NO: 39-6090019

ORIGINAL INVOICE

Account Number	Invoice Number	Invoice Date	Terms
0000894449	57152908	02/29/12	Net 30

BILL TO ADDRESS
INDUSTRIAL LAMINATES/NORP
665 LYBRAND ST
POSTVILLE IA 52162-7792

SERVICE LOCATION
INDUSTRIAL LAMINATES/NORP
665 LYBRAND ST
POSTVILLE IA 52162-7792

SK Service Facility
BR DAVENPORT

Special Billing Code #
003 52

Facility Phone
563-386-3024

Service Date
02/29/12

Service Number
0000894449

Department #	Department	Release #	Transporter	Manifest #	Tax Status/#	PO Number
				003040850SKS		

QUANTITY	DESC./REFERENCE NUMBER	PRICE PER	SALES TAX	ITEM TOTAL
1.000	40G PARTS WASHER SERVICE - SOLVENT 0000054150-16-000035939-0000000	347.4700 EA	24.32	371.79
1.000	FEE, FUEL SURCHARGE 0000100001-24-000000000-0000000	16.1200 EA	1.13	17.25

SUBTOTAL	363.59
TOTAL TAX	25.45
TOTAL AMOUNT DUE	**$389.04**

Comments:
Please be advised delinquent payments may result in a Late Payment Charge of $25.00. To avoid a Late Payment Charge and service interruptions, please ensure that all payments are received by the invoice due date.

The leading provider of responsible cleaning, environmental and re-refining solutions.

X DR 3-12-12

5086 OR Acct# 419-1 3-12-12

Please detach and enclose this coupon with your payment.

safety-kleen®

SAFETY-KLEEN SYSTEMS, INC
5360 LEGACY DRIVE
PLANO, TX 75024

safety-kleen®

Account Number	Invoice Number	Invoice Date	Service Number
0000894449	57152908	02/29/12	0000894449

PLEASE RETURN THIS PORTION WITH PAYMENT.
MAKE ANY ADDRESS CORRECTIONS BELOW.

Date Due	Amount Due
03/30/12	$389.04

00057152908000089444960000389047

MDG2012 00002363 1 MB 0404 9 1

INDUSTRIAL LAMINATES/NORP
665 LYBRAND ST
POSTVILLE IA 52162-7792

SAFETY-KLEEN
PO BOX 650509
DALLAS, TX 75265-0509

SFK-INVOICE

003285 002363 0001 0001

7154

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: IAD073489288
2. Page 1 of: 1
3. Emergency Response Phone: 1-800-468-1760
4. Manifest Tracking Number: 003040850 SKS

GENERATOR

5. Generator's Name and Mailing Address
INDUSTRIAL LAMINATES/NORP
665 LYBRAND ST
POSTVILLE IA 52162-7792
Generator's Phone: 563-864-7321

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC.
U.S. EPA ID Number: TXR000050930

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: SAFETY-KLEEN SYSTEMS, INC.
3035 WEST 73RD STREET
DAVENPORT, IA 52806
Facility's Phone: 563-386-3024
U.S. EPA ID Number: IAD098027592

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. NA1993 WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) PGIII	002	DM	028	G	D039
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: SK SHIP#206328783 57152908 894449 20129 C86:16

1)ERG#128;
24 HR EMERGENCY # 800-468-1760(SAFETY-KLEEN - 94138)
SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JON THURSTENSON
Signature: Jon Thurstenson
Month: 02 Day: 29 Year: 12

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: JOHN T HAZELETT
Signature: John T. Hazelett
Month: 02 Day: 29 Year: 12

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number

Attachment 13 Page 30 of 32

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: P. L. Adams
Signature
Month: 03 Day: 09 Year: 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.
17717/150055

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-003

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number | 2. Page 1 of | 3. Emergency Response Phone | 4. Manifest Tracking Number: 003040850 SKS

GENERATOR

5. Generator's Name and Mailing Address | Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name | U.S. EPA ID Number

7. Transporter 2 Company Name | U.S. EPA ID Number

8. Designated Facility Name and Site Address | U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.					
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name | Signature | Month | Day | Year

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name | Signature | Month | Day | Year

Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number

Attachment 13 Page 31 of 32

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name | Signature | Month | Day | Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

GENERATOR'S INITIAL COPY

SAFETY-KLEEN 02/04/2012 PAGE: 1
PLANT: 7154 LDR NOTIFICATION FORM 10:03:47
GENERATOR NAME: INDUSTRIAL LAMINATES/NORP MANIFEST NO.: 003040853
OR SALES SERVICE NO.: 57152908
SK Shipping #: 206328783 CUST#: 894449
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste r stricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01/001 SK PRFL NO.: 0000150055
SKDOT#: 0000717

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D039
Treatability group: NNW Non-Waste Water
Waste Constituent Notification:
Legend

Number	Constituent
229	TETRACHLOROETHYLENE
237	TRICHLOROETHYLENE
250	CADMIUM
251	CHROMIUM (TOTAL)
255	LEAD
257	MERCURY - ALL OTHERS

Attachment 13 Page 32 of 32

NOTES
EXP NOTICE: THIS LDR EXPIRES ON 12/31/2012

Jon Thorsteson
GENERATOR'S AUTHORIZED SIGNATURE
JON THORSTESON
NAME & TITLE (PRINTED OR TYPED)
02/28/20
DATE

PLANT: 7154 CSG: 16 REF#: 57152908 SW: 20129
TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSF

ATTACHMENT 14

MSDS FOR SAFETY-KLEEN PREMIUM

(Seven Pages)

safety-kleen.

Material Safety Data Sheet

Material Name: SAFETY-KLEEN PREMIUM SOLVENT **ID: 82658**

* * * Section 1 - Chemical Product and Company Identification * * *

Product Code: 6605, 6616
Product Use: Cleaning and degreasing metal parts. If this product is used in combination with other products, refer to the Material Safety Data Sheet for those products.
Synonyms: Parts Washer Solvent; Petroleum Distillates; Petroleum Naphtha; Naphtha, Solvent; Stoddard Solvent; Mineral Spirits.

Safety-Kleen Systems, Inc.
5360 Legacy Drive
Building 2, Suite 100
Plano, TX 75024

Phone: 1-800-669-5740

Emergency # 1-800-468-1760
www.safety-kleen.com

Issue Date
January 20, 2012
Supersedes Issue Date
November 30, 2009
Original Issue Date
January 26, 1995
PREPARED BY: Product MSDS Coordinator APPROVED BY: MSDS Task Force

* * * Section 2 - Hazardous Identification * * *

EMERGENCY OVERVIEW
Appearance
Liquid, clear, colorless to pale yellow, mild hydrocarbon odor.
Signal Word
WARNING!
Physical Hazards
Combustible liquid and vapor.
Health Hazards
May be harmful if inhaled. May irritate the respiratory tract (nose, throat, and lungs), eyes, and skin. May be harmful if swallowed. Contains material that may cause central nervous system and kidney damage.
POTENTIAL HEALTH EFFECTS
Inhalation (Breathing)
High concentrations of vapor may be harmful if inhaled. High concentrations of vapor or mist may irritate the respiratory tract (nose, throat, and lungs). High concentrations of vapor or mist may cause nausea, vomiting, headaches, dizziness, loss of coordination, numbness, and other central nervous system effects. Massive acute overexposure may cause rapid central nervous system depression, sudden collapse, coma, and/or death.
Eyes
May cause irritation.
Skin
May cause irritation. Not likely to be absorbed in harmful amounts.
Ingestion (Swallowing)
May be harmful if swallowed. May cause throat irritation, nausea, vomiting, and central nervous system effects as noted under **INHALATION (BREATHING)**. Breathing product into the lungs during ingestion or vomiting may cause lung injury and possible death.
Medical Conditions Aggravated by Exposure
Individuals with pre-existing respiratory tract (nose, throat, and lungs), central nervous system, kidney, eye, and/or skin disorders may have increased susceptibility to the effects of exposure.

Chronic

Prolonged or repeated inhalation may cause toxic effects as noted under **INHALATION (BREATHING)**. Prolonged or repeated exposure may cause central nervous system and kidney damage. Prolonged or repeated eye contact may cause inflammation of the membrane lining the eyelids and covering the eyeball (conjunctivitis). Prolonged or repeated skin contact may cause drying, cracking, redness, itching, swelling (dermatitis) and or burns.

Cancer Information

No known carcinogenicity. For more information, see **SECTION 11: CARCINOGENICITY**. Also see **SECTION 15: CALIFORNIA**.

Environmental Hazards

Product is not toxic to aquatic life. Also see **SECTION 12: ECOLOGICAL INFORMATION**.

* * * Section 3 - Composition / Information on Ingredients * * *

CAS	Component	Percent
64742-47-8	Distillates (petroleum), hydrotreated light	100

Component Related Regulatory Information

This product may be regulated, have exposure limits or other information identified as the following: Stoddard solvent (8052-41-3).

* * * Section 4 - First Aid Measures * * *

Inhalation (Breathing)

Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Oxygen should only be administered by qualified personnel. Someone should stay with victim. Get medical attention if breathing difficulty persists.

Eyes

If irritation or redness from exposure to vapor develops, move away from exposure into fresh air. Upon contact, immediately flush eyes with plenty of lukewarm water, holding eyelids apart, for 15 minutes. Get medical attention.

Skin

Remove affected clothing and shoes. Wash skin thoroughly with soap and water. Get medical attention if irritation or pain develops or persists.

Ingestion (Swallowing)

Do NOT induce vomiting. Immediately get medical attention. Call 1-800-468-1760 for additional information. If spontaneous vomiting occurs, keep head below hips to avoid breathing the product into the lungs. Never give anything by mouth to an unconscious person.

Notes to Physicians

Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-468-1760 for additional information.

* * * Section 5 - Fire Fighting Measures * * *

Hazardous Combustion Products

Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and unidentified organic compounds.

Conditions of Flammability

Heat, sparks, or flame.

Extinguishing Media

Carbon dioxide, regular foam, dry chemical, water spray, or water fog.

Protective Equipment For Firefighting

Firefighters should wear full-face, self contained breathing apparatus and impervious protective clothing. Firefighters should avoid inhaling any combustion products.

Fire Fighting Equipment/Instructions

Keep storage containers cool with water spray. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies.

NFPA Ratings: Health: 1 **Fire:** 2 **Reactivity:** 0
Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe

Fire and Explosion Hazards

Vapor explosion hazard indoors, outdoors, or in sewers. Vapors may travel to ignition source and flashback. Vapors will spread along the ground and collect in low or confined areas. Run-off to sewer may create a fire hazard. Heated containers may rupture or be thrown into the air. "Empty" containers may retain residue and can be dangerous. Products are not sensitive to mechanical impact. Products may be sensitive to static discharge, which could result in fire or explosion.

* * * Section 6 - Accidental Release Measures * * *

Remove all ignition sources. Do not touch or walk through spilled product. Stop leak if you can do it without risk. Wear protective equipment and provide engineering controls as specified in **SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**. Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Ventilate area and avoid breathing vapor or mist. A vapor suppressing foam may be used to reduce vapors. Contain spill away from surface water and sewers. Contain spill as a liquid for possible recovery, or sorb with compatible sorbent material and shovel with a clean, sparkproof tool into a sealable container for disposal. Additionally, for large spills: Water spray may reduce vapor, but may not prevent ignition in closed spaces. Dike far ahead of liquid spill for collection and later disposal.

* * * Section 7 - Handling and Storage * * *

Handling Procedures

Keep away from heat, sparks, or flame. Where flammable mixtures may be present, equipment safe for such locations should be used. Use clean, sparkproof tools and explosion-proof equipment. When transferring product, metal containers, including trucks and tank cars, should be grounded and bonded. Do not breathe vapor or mist. Use in a well ventilated area. Avoid contact with eyes, skin, clothing, and shoes. Do not smoke while using this product.

Shipping and Storing

Keep container tightly closed when not in use and during transport. Store containers in a cool, dry place. Do not pressurize, cut, weld, braze, solder, drill, or grind containers. Keep containers away from heat, flame, sparks, static electricity, or other sources of ignition. Empty product containers may retain product residue and can be dangerous. See **SECTION 14: TRANSPORTATION INFORMATION** for Packing Group information.

* * * Section 8 - Exposure Controls / Personal Protection * * *

Exposure Guidelines

Component Exposure Limits

Distillates (petroleum), hydrotreated light (64742-47-8)

ACGIH:	100 ppm TWA (related to Stoddard solvent)
OSHA Final:	500 ppm TWA; 2900 mg/m3 TWA (related to Stoddard solvent)
OSHA Vacated:	100 ppm TWA; 525 mg/m3 TWA (related to Stoddard solvent)
NIOSH:	350 mg/m3 TWA (related to Stoddard solvent)
	1800 mg/m3 Ceiling (15 min, related to Stoddard solvent)

Engineering Controls

Provide general ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where adequate general ventilation is unavailable, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below applicable exposure limits. Where explosive mixtures may be present, equipment safe for such locations should be used.

Personal Protective Equipment: Respiratory

Use NIOSH-certified P- or R- series particulate filter and organic vapor cartridges when concentration of vapor or mist exceeds applicable exposure limits. Protection provided by air purifying respirators is limited. Do not use N-rated respirators. Selection and use of respiratory protective equipment should be in accordance in the USA with OSHA General Industry Standard 29 CFR 1910.134; or in Canada with CSA Standard Z94.4.

Personal Protective Equipment: Eyes/Face

Where eye contact is likely, wear chemical goggles; contact lens use is not recommended.

Personal Protective Equipment: Skin

Where skin contact is likely, wear neoprene, nitrile, or equivalent protective gloves; use of natural rubber or equivalent gloves is not recommended.

To avoid prolonged or repeated contact with products where spills and splashes are likely, wear appropriate chemical-resistant faceshield, boots, apron, coveralls, long sleeve shirts, or other protective clothing.

Personal Protective Equipment: Personal Hygiene

Use good personal hygiene. Wash thoroughly with soap and water after handling product and before eating, drinking, or using tobacco products. Clean affected clothing, shoes, and protective equipment before reuse. Discard affected clothing, shoes, and/or protective equipment if they cannot be thoroughly cleaned. Discard leather articles, such as shoes, saturated with this product.

Other Personal Protective Equipment

Where spills and splashes are likely, facilities storing or using these products should be equipped with an emergency eyewash and shower, both equipped with clean water, in the immediate work area.

* * * Section 9 - Physical & Chemical Properties * * *

Appearance/Odor :	Liquid, clear, colorless to pale yellow, mild hydrocarbon odor .	**pH:**	Not applicable.
Boiling Point:	350°F (177°C) (initial)	**Melting Point:**	-45°F (-43°C) (maximum)
Solubility (H2O):	Insoluble.	**Specific Gravity:**	0.77 to 0.82 at 60°F (15.6°C) (water = 1)
Density:	6.4 to 6.7 LB/US gal (770 to 800 g/l)	**Octanol/H2O Coeff.:**	Not available.
Evaporation Rate:	<0.1 (butyl acetate = 1)	**Molecular Weight:**	Not available.
Odor Threshold:	30 ppm (based on Stoddard Solvent)	**Auto Ignition:**	480°F (249°C) (minimum)
LFL:	0.7 VOL% (minimum)	**Flash Point:**	148°F (64°C) (minimum)
UFL:	5 VOL% (maximum)		
Vapor Pressure:	0.2 mm Hg at 68°F (20°C) 0.6 mm Hg at 100°F (37°C)		

* * * Section 10 - Chemical Stability & Reactivity Information * * *

Stability

Stable under normal temperatures and pressures.

Incompatibility

Avoid acids, alkalies, oxidizing agents, reducing agents, or reactive halogens.

Reactivity

Polymerization is not known to occur under normal temperature and pressures. Not reactive with water.

Hazardous Decomposition Products

None under normal temperatures and pressures. See also **SECTION 5: HAZARDOUS COMBUSTION PRODUCTS**.

Conditions To Avoid

Avoid heat, sparks, or flame.

* * * Section 11 - Toxicological Information * * *

Toxicity Data

Component Analysis - LD50/LC50

Distillates (petroleum), hydrotreated light (64742-47-8)

Inhalation LC50 Rat >5.2 mg/L 4 h; Oral LD50 Rat >5000 mg/kg; Dermal LD50 Rabbit >2000 mg/kg

Acute Effects

May be harmful if inhaled. May irritate the respiratory tract (nose, throat, and lungs), eyes, and skin. May be harmful if swallowed. Contains material that may cause central nervous system and kidney damage. Breathing product into the lungs during ingestion or vomiting may cause lung injury and possible death.

Repeated Dose Effects

Prolonged contact may cause kidney or central nervous system damage.

Carcinogenicity

Component Carcinogenicity

None of this product's components are listed by ACGIH, IARC, OSHA, NIOSH, or NTP.

Target Organ Effects
Product can irritate skin and eyes. Product can be aspirated into lungs.
Mutagenicity
Based on best current information, there is no known mutagenicity associated with this product.
Teratogenicity
Based on best current information, there is no known teratogenicity associated with this product.

*** Section 12 - Ecological Information ***

Ecotoxicity
A Static Acute Bioassay as per California Department of Fish and Game WPCL was done using fathead minnows and up to 750 ppm of the products in water. The material passed the bioassay.
Component Analysis - Ecotoxicity - Aquatic Toxicity
Distillates (petroleum), hydrotreated light (64742-47-8)

Duration/Test/Species	Concentration/Conditions/Notes
96 Hr LC50 Pimephales promelas	45 mg/L [flow-through]
96 Hr LC50 Lepomis macrochirus	2.2 mg/L [static]
96 Hr LC50 Oncorhynchus mykiss	2.4 mg/L [static]

Persistence/Degradability
Product is not expected to be readily biodegradable.
Bioaccumulation/Accumulation
Product is not expected to bioaccumulate.
Mobility in Environmental Media
Product is expected to have high soil mobility.
Other Adverse Effects
No information available for the product.

*** Section 13 - Disposal Considerations ***

Disposal Instructions
Dispose in accordance with federal, state, provincial, and local regulations. Regulations may also apply to empty containers. The responsibility for proper waste disposal lies with the owner of the waste. Contact Safety-Kleen regarding proper recycling or disposal.
US EPA Waste Number & Descriptions
Not regulated. Based on available data, this information applies to the product as supplied to the user. Processing, use, or contamination by the user may change the waste code applicable to the disposal of this product.

*** Section 14 - Transportation Information ***

Emergency Response Guide Number
128 Reference *.North American Emergency Response Guidebook*
DOT
Bulk Packages (>119 Gallons): Shipping Name: Combustible liquid, n.o.s. (petroleum naphtha) **UN/NA #:** NA1993. **Hazard Class:** Combustible liquid. **Packing Group:** III **Required Placards:** Class 3, NA1993

Non-bulk Packages (<120 Gallons): Shipping Name: Cleaning compounds (Petroleum naphtha) (Not US DOT regulated). **UN/NA #:** None. **Hazard Class:** None **Packing Group:** None **Required Label(s):** None

Shipping Name: Non-regulated goods.

TDG
Shipping Name: Not regulated as a dangerous good.

IATAInformation

No Classification Assigned.

IMDGInformation

No Classification Assigned.

*** Section 15 - Regulatory Information ***

Volatile Organic Compounds (As Regulated)

100 WT%; 6.4-6.7 LB/US gal; 770-800 g/l
As per 40 CFR Part 51.100(s)
VOC Vapor Pressure Approx 0.2 mmHg @20°C
Product may or may not be considered photochemically reactive (100% by weight). Consult your state or local air district regulations for location specific information.

SARA Sections 311/312

This product poses the following health hazards as defined in 40 CFR Part 370 and are subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA):
Immediate (Acute) Health Hazard
Delayed (Chronic) Health Hazard
Fire Hazard

SARA 302/304

Component Analysis

This product does not contain any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 302 or Section 304 as identified in 40 CFR Part 355, Appendix A and B.

SARA Section 313

This product does not contain "toxic" chemicals subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.

Component Analysis

This product does not contain any "toxic" chemical subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.

CERCLA

Component Analysis

This product does not contain any "hazardous substance" listed under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4.

TSCA

The component of this product is listed on, or is automatically included as "naturally occurring chemical substances" on, or is exempted from the requirement to be listed on, the TSCA Inventory.

Component Analysis

Component	CAS #	TSCA
Distillates (petroleum), hydrotreated light	64742-47-8	Yes

State Regulations

This product may contain a detectable amount of benzene CAS 71-43-2,p-dichlorobenzene CAS 106-46-7, ethylbenzene CAS 100-41-4, and naphthalene CAS 91-20-3. WARNING: These chemicals are known to the State of California to cause cancer.

This product may contain a detectable amount of benzene CAS 71-43-2 and toluene CAS 108-88-3. WARNING: These chemicals are known to the State of California to cause birth defects or other reproductive harm.

U.S. State Regulations

The following components appear on one or more of the following state hazardous substances lists:

Component	CAS	MA	MN	NJ	PA	CA
Distillates (petroleum), hydrotreated light (*related to: Stoddard solvent)	64742-47-8	Yes*	Yes*	Yes*	Yes*	Yes*

Canadian Regulations

This product have been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all information required by the CPR.

Component Analysis

Component	CAS #	CAN
Distillates (petroleum), hydrotreated light	64742-47-8	DSL

Canadian WHMIS Information

Class B3 - Combustible Liquid Class D2B - Irritating to eyes and skin.

Component Analysis - WHMIS IDL

The following components are identified under the Canadian Hazardous Products Act Ingredient Disclosure List:
Distillates (petroleum), hydrotreated light (64742-47-8) 1 % (related to Stoddard solvent)

Canadian Environmental Protection Act (CEPA)

The component of this product is listed on, or is automatically included as "substance occurring in nature" on, or is exempted from the requirements to be listed on, the Canadian Domestic Substances List (DSL).

* * * Section 16 - Other Information * * *

Label/Other Information

These products are United States Department of Agriculture (USDA) approved and ETL classified.

Revision Information

Section 15, VOC information.

Disclaimer

User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either expressed or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to the information or the product to which the information refers. The data contained on this sheet apply to the product as supplier to the user.

End of Sheet 82658

ATTACHMENT 15

UNIVERSAL WASTE BILL OF LADING

(One Page)

www.retrofitcompanies.com

UNIVERSAL WASTE BILL OF LADING

Page:

RETROFIT RECYCLING

3855 Hwy 14 West
Owatonna, MN 55060
(651) 766-7422 (800) 274-1309

ORDER DATE: 06/28/2011
SALESPERSON: Iowa Northeast Territory
BOL NUMBER: 0048415
SHIP DATE:
CONTACT: Jon Thorstenson
563-864-4232

(563) 864-7321

LL TO:
..orplex - Micarta
665 Lybrand Street
PO Box 977
Postville, IA 52162

PICK UP ADDRESS:
Norplex - Micarta
665 Lybrand Street
Postville, IA 52162

EMERGENCY RESPONSE NUMBER: 651-229-4014

Customer P.O.# Ship VIA: IOWA

Item	Description	Ordered	Shipped
UNIVERSAL WASTE LAMPS - Non-Regulated (per 49 CFR 173.164(e))			
R1001	4' & Under Fluorescent Lamp	52	1
R1002	Over 4' Fluorescent Lamp	142	73
R1003	Compact Fluorescent Lamp	0	
R1004	Circular Fluorescent Lamp	0	
R1005	High Intensity Discharge (HID)	21	1
R1006	Shatter Shield Lamps	0	
R1007	U-Shaped Fluorescent Lamp	0	
R1009	Incandescent/Halogen Lamp	14	14
R1010	Broken/Crushed Fluorescent Lamp	0	
R1011	UV Lamp	0	
R1012	Neon	0	
ELECTRONICS			
R1301	Computer Monitor: Per lb.	0	
'302	Electronic Equipment	0	
.303	Televisions	0	
PACKAGING			
R1100	4' Lamp Fiber Barrel	1	1
R1100	4' Lamp Fiber Barrel -Returned	1-	1
R1115	2' Lamp Fiber Barrel	0	
R1115	2' Lamp Fiber Barrel -Returned	0	
R1101	4' Lamp Box	0	
R1102	8' Lamp Box	0	
R1103	UN1A2 DOT Steel Drum	0	
R1107	Gaylord Boxes	0	
R1119	UN 1.25 Gallon Poly Pail	0	
R1104	UN1H2 5 Gal. Plastic Pail w/cover	4	4
R1105	UN1H2 14 Gal. OH Plastic Drum	0	
R1106	UN1H2 30 Gal. OH Plastic Drum	0	
R1117	55 Gal. OH Poly Drum w/cover	0	
UNIVERSAL WASTE BATTERIES			
R1400	Alkaline Battery	62	
R1401	Mixed Dry Cell Batteries	0	
R1402	Nickel Cadmium (Ni-Cad)Battery	2	
R1403	Nickel Metal Hydride (Ni-MH) Battery	0	
R1404	UN3090; Lithium Battery;9;PGII	3	
R1405	UN3028; Batteries, Dry, Containing Potassium Hydroxide Solid; 8; PGIII (Mercury Battery)	73	
R1406	UN2794; Batteries, Wet, Filled with Acid 8; PGIII	0	
MERCURY ITEMS			
R1201	Liquid Mercury	0	
R1202	Mercury Contained in Manufactured Articles	0	
R1203	Mercury Debris: See Haz Waste Manifest	0	
BALLASTS			
R1500	Small PCB Cap Incineration: See Haz Waste Manifest	0	
R1506	Small Non-PCB Cap Incineration	0	
R1502	PCB Ballast -TSCA: See Haz Waste Manifest	0	
R1503	Non-PCB Ballast for Recycling	0	
TRANSPORTED/MISC. ITEMS			
R1600	Appliances - Residential	0	
R1601	Appliances - Industrial	0	
/9024	5G Latex Paint Recycling	0	
/9023	1G Latex Paint Recycling	0	
/OIL	Used Oil Recycling (Quantity)		
/9501	Door Closures (lbs)	0	

COMMENTS

Arrival:_____ Departure:_____

T8:_____ T12:_____

Swap LB PU boxed lamps and batteries Drop off (4) 5G Hours 8-3pm 2DC Pat Harms 563-864-7321.

Attachment 15 Page 1 of 1

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled. They are in the proper condition for transportation according to the applicable regulations of the Department of Transportation. All above named materials are for recycling only.

Generator Signature: _____ Date: _____ DRIVER: _____

Terms: Net 45 (1.5% Finance Charge on Overdue Accounts)

ATTACHMENT 16

INSPECTION LOGS

(11 Page)

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

HAZARDOUS WASTE & STORM WATER INSPECTION REPORT *Friday, August 19th, 2011*

ITEM	COMPLIANT	NON COMPLIANT	NOTES / CORRECTIVE ACTIONS
Satellite Accumulation Areas†			
• Waste located at or near point of generation	✓		
• < 55 gallons of waste	✓		
• Containers marked "Hazardous Waste"	✓		
• Containers labeled with description of waste type	✓		
• Appropriate placards applied	✓		
• Fill date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• Area under control of the operator	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
90 Day Storage Areas‡			

Attachment 16 Page 1 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

HAZARDOUS WASTE & STORM WATER INSPECTION REPORT *Wednesday, September 7th, 2011*

ITEM	COMPLIANT	NON COMPLIANT	NOTES / CORRECTIVE ACTIONS
Satellite Accumulation Areas†			
• Waste located at or near point of generation	✓		
• < 55 gallons of waste	✓		
• Containers marked "Hazardous Waste"	✓		
• Containers labeled with description of waste type	✓		
• Appropriate placards applied	✓		
• Fill date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• Area under control of the operator	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
90 Day Storage Areas‡			

Attachment 16 Page 2 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

HAZARDOUS WASTE & STORM WATER INSPECTION REPORT *Friday, September 16th, 2011*

ITEM	COMPLIANT	NON COMPLIANT	NOTES / CORRECTIVE ACTIONS
Satellite Accumulation Areas†			
• Waste located at or near point of generation	✓		
• < 55 gallons of waste	✓		
• Containers marked "Hazardous Waste"	✓		
• Containers labeled with description of waste type	✓		
• Appropriate placards applied	✓		
• Fill date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• Area under control of the operator	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
90 Day Storage Areas‡			

Attachment 16 Page 3 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

HAZARDOUS WASTE & STORM WATER INSPECTION REPORT *Tuesday, September 27th, 2011*

ITEM	COMPLIANT	NON COMPLIANT	NOTES / CORRECTIVE ACTIONS
Satellite Accumulation Areas†			
• Waste located at or near point of generation	✓		
• < 55 gallons of waste	✓		
• Containers marked "Hazardous Waste"		X	Container in upper compounding not marked Hazardous Waste. Container needs correct label.
• Containers labeled with description of waste type		X	Container in upper compounding (same as above) not marked with description of waste type. Container needs correct label.
• Appropriate placards applied	✓		
• Fill date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• Area under control of the operator	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
90 Day Storage Areas‡			

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

Attachment 16 Page 4 of 11

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

HAZARDOUS WASTE & STORM WATER INSPECTION REPORT *Friday, December 2nd, 2011*

ITEM	COMPLIANT	NON COMPLIANT	NOTES / CORRECTIVE ACTIONS
Satellite Accumulation Areas†			
• Waste located at or near point of generation	✓		
• < 55 gallons of waste	✓		
• Containers marked "Hazardous Waste"	✓		
• Containers labeled with description of waste type	✓		
• Appropriate placards applied	✓		
• Fill date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• Area under control of the operator	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
90 Day Storage Areas‡			

Attachment 16 Page 5 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

HAZARDOUS WASTE & STORM WATER INSPECTION REPORT *Tuesday, December 13th, 2011*

ITEM	COMPLIANT	NON COMPLIANT	NOTES / CORRECTIVE ACTIONS
Satellite Accumulation Areas†			
• Waste located at or near point of generation	✓		
• < 55 gallons of waste	✓		
• Containers marked "Hazardous Waste"	✓		
• Containers labeled with description of waste type	✓		
• Appropriate placards applied	✓		
• Fill date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• Area under control of the operator	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
90 Day Storage Areas‡			

Attachment 6 Page 6 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

HAZARDOUS WASTE & STORM WATER INSPECTION REPORT *Wednesday, May 9, 2012*

ITEM	COMPLIANT	NON COMPLIANT	NOTES / CORRECTIVE ACTIONS
Satellite Accumulation Areas†			
• Waste located at or near point of generation	✓		
• < 55 gallons of waste	✓		
• Containers marked "Hazardous Waste"	✓		
• Containers labeled with description of waste type	✓		
• Appropriate placards applied	✓		
• Fill date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• Area under control of the operator	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
90 Day Storage Areas‡			

Attachment 16 Page 7 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

• Containers marked "Hazardous Waste"	✓		
• Containers labeled with description of waste type	✓		
• Appropriate placards applied	✓		
• Initial accumulation date marked	✓		
• Closed (except when adding/removing wastes)	✓		
• Grounded (if flammable)	✓		
• Surface deterioration, cracks, leaks and structural defects	✓		
• General area is clean and free of debris	✓		
• No waste greater than 90 days old	✓		
• Hazardous waste labels and placards visible and unobstructed	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
• Weekly inspection of containers	✓		
Misc. Waste Storage Requirements Note: Some of these items may not apply to all waste storage areas, depending on the storage location			
• Sheltered from rain or rainwater runoff	✓		
• Proper signs and identification are in place at entrance	✓		
• Telephone is readily available and operational	✓		
• Access is limited to authorized personnel only and area is locked	✓		

Attachment 16 Page 8 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

• Adequate aisle space	✓		
• Labels and placards visible	✓		
• Original product drum labels painted over before use as a scrap drum	✓		
• Spill Kit available	✓		
• General area is clean and free of debris	✓		
• Floor surfaces are clean, free of cracks and in good repair	✓		
• Fire extinguishers with current annual inspection are present (if applicable)	✓		
• Safety showers/eyewashes are available and functional (if applicable)	✓		
• Do not dispose of hazardous waste in the dumpsters/landfill.	✓		
Universal Waste (Lamps / Batteries)			
• Containers marked "Universal Waste Lamps" *or* "Waste Lamps" *or* "Used Lamps"	✓		
• Initial accumulation date marked	✓		
• Containers are kept closed (except when adding/removing wastes)	✓		
• In good condition	✓		
• Universal waste kept in an approved containers	✓		
• Universal waste stored indoors.	✓		
Empty Barrels			

Attachment 16 Page 7 of 11

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

• Clean and free of chemical residue (≤1in of residue)	✓		
• Surface deterioration, cracks, leaks and structural defects		X	Two RCRA empty containers had leaked resin on to the floor of the storage trailer. For the future, containers on the storage trailer should be stored standing up (not laying on a side). Also, the person who puts the container on the trailer is the person responsible for stacking the container. Finally, if the container has liquid resin built up on the outside do NOT put it on the trailer as-is. Instead, clean up the resin on the outside before putting the container on the trailer.
• Labels and placards in place	✓		
• Containers are kept closed	✓		
Secondary Containment			
• Surface deterioration, cracks, leaks and structural defects	✓		
• Water/residue accumulation	✓		
Tanks & Piping			
• Foundation Supports	✓		
• Seams	✓		
• Gaskets	✓		
• Valves	✓		
• Bungs	✓		
• Man ways	✓		
• Gauges	✓		

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

• Pipe Connections			
• Deterioration			
• Spillage			
Storm Water			
• Ground or water surface stained by oil or significant materials			
• Waste materials kept on site in closed leak tight containers			
• Leaking vehicles or equipment equipped with drip pans			
• Outside areas kept neat, clean and orderly			
• Garbage cans, waste bins and dumpsters covered			
• Vessels and empty barrels are properly closed or covered to prevent storm water accumulation			
• Storm water conveyance altered recently			
• Storm water drainage paths clear and grates clean			
• Equipment wash water properly collected and disposed			

Attachment 14 Page 14 of 11

Additional Comments:

Signature of Manufacturing Engineer:  Date: Wednesday, May 9, 2012

† Satellite Accumulation Areas: upper compounding, laboratory & maintenance
‡ 90 Day Storage Area: between treaters 204 & 206, outside treater 201, treaters 208 & 209, near the remediation well, still room and adjacent to the barrel storage shed

ATTACHMENT 17

TRAINING LOGS

(Four Pages)

2012 RCRA/DOT Training Sign-Up Sheet

Department	Title	Signature	Name	Shift
Administrative	Plant Manager		Alan Johnson	1
Administrative	Sheet Production Manager		Dave Lensing	1
Administrative	Tube Production Manager		Drake Defrane	1
Administrative	1st Shift Supervisor		Dan Roffman	1
Administrative	2nd Shift Supervisor		Les Tieskoetter	2
Administrative	3rd Shift Supervisor		John Elledge	3
Administrative	Safety Manager		Dixie Doeppke	1
Treating	Treater I - Group Leader		Jerry Bissell	1
Treating	Treater i - Group Leader		Earl Hendry	2
Treating	Treater I - Group Leader		Darrin Walch	3
Treating	Treater I		Lorna Jones	1
Treating	Treater I		Kathy Wagner	1
Treating	Treater i		Terry McNally	1
Treating	Treater I		Martin Miller	1
Treating	Treater i		Dan Leibold	1
Treating	Treater I		Mike Einck	1
Treating	Treater i		Alphonso Rios	2
Treating	Treater I		Charlotte Hallberg	2
Treating	Treater i		Nathan Heins	2
Treating	Treater I		Jason Stoddard	2
Treating	Treater I		Jared Klingeman	2
Treating	Treater I		Shane Wedo	2
Treating	Treater i		Patti Duvel	3
Treating	Treater I		Darin Berg	3
Treating	Treater i		Dennis Hartson	3
Treating	Treater I		Brian Thomas	3
Treating	Treater i		Earl Gibson	3
Treating	Treater I		Ron Ramsey	3
Compounding	Compounder i		Roger Huinker	1
Compounding	Compounder I		David Wilker	2
Compounding	Compounder i		Duane Koenig	3
Receiving	Reciever		Dennis Hesse	1
Receiving	Reciever		Daryl Szabo	1
Press	Reciever		Dan Hofschulte	1
Manufacturing Engineering / QA Manager	Manufacturing Engineering / QA Manager		Dan Krammen	1
Manufacturing Engineering	Manufacturing Engineer		Tim Delaney	1
Manufacturing Engineering	Manufacturing Engineer		Andy Janda	1
Manufacturing Engineering	Manufacturing Engineer		Deanna Giancaspro	1
Manufacturing Engineering	Manufacturing Engineer		Jon Thorstenson	1
Quality Assurance	Laboratory Manager		Cindy Gordon	1

Quality Assurance	Document Controller		Rick Reinhardt	1
Quality Assurance	Lab Technician		Dawn Szabo	1
Quality Assurance	Lab Technician		Hartly Enyart	2
Quality Assurance	Lab Technician		Steve Johnson	2
Quality Assurance	SPC Technician		Jim Bork	1
Quality Assurance	Lab Technician		Frank Hillman	3
Quality Assurance	Lab Technician		Jerry Jostand	1
Product Development	Product Development Engineer		Rick Lowery	1
Maintenance	Facilities Engineer		Pat Harms	1
Maintenance	Maintenance Manager/Purchasing		Ray Severson	1
Maintenance	Maintenance I - Group Leader		Shawn Thurn	1
Maintenance	Maintenance I - Group Leader	Gaylon Jennings	Gaylon Jennings	2
Maintenance	Maintenance I - Group Leader		Rod Bries	3
Maintenance	Maintenance Mechanic I		Luke Wolfs	1
Maintenance	Maintenance Mechanic I		Alan Reicks	1
Maintenance	Maintenance Mechanic I	See Below	Brian Murphy	1
Maintenance	Maintenance Mechanic I		Jeff Joyner	1
Maintenance	Maintenance Mechanic I		Daren Shaffer	2
Maintenance	Maintenance Mechanic I		Jeff Valley	2
Maintenance	Maintenance Mechanic II	Jason Grimes	Jason Grimes	2
Maintenance	Maintenance Mechanic I		Don Miller	3
Maintenance	Maintenance Mechanic I		Justin Williams	3
Maintenance	Maintenance Mechanic I		Scott Miene	3
Shipping	Traffic Manager		Joe Balk	1
Shipping	Shipping Clerk		Don Gullickson	1
Shipping	Shipping Clerk		Sue H.	1
Treating Maint	Treater I	Marjorie Thornton	Marjorie Thornton	3
		Dave Palas		1
		Brian Murphy	Brian Murphy	

Certificate of Achievement

HWMC

This certificate has been awarded to:

Timothy J Delaney

at

Baltimore, MD area

Session# 1-13-15

For successfully completing the Lion Technology Inc. Hazardous/Toxic Waste Management Workshop on the applicable regulations of the United States Environmental Protection Agency and guidelines, standards and procedures for safe and legal management of waste designated as hazardous.

This workshop is designed to satisfy the annual training mandate for typical managers and supervisors of hazardous waste compliance activities. Training was conducted by Lion Technology Inc., 21 Sunset Inn Road, Lafayette, NJ 07848 (973-383-0800).*
**[Ref. 40 CFR 262.34(a)(4) and 265.16 or 40 CFR 262.34(d)(5)(iii)]*

This training completed on: ***June 21, 2011***

Lion Technology Member PIN: 7049697

1.4 CEUs, 16 IHMM CM Points, 2.34 ABIH CM Points, 14 NEHA CE Points Awarded

Regan Bottomley
INSTRUCTOR

LION TECHNOLOGY INC.

Attachment 17 Page 3 of 4

COURSE OVERVIEW

Day One

Welcome and Course Logistics

Section 1: Introduction

A brief history of RCRA and its primary goals. An overview of the structure and applicability of the regulations.

Section 2: Waste ID

A step-by-step process for identifying hazardous waste:

a. The definition of solid waste, including reliefs

b. Exclusions

c. The definition of hazardous waste

   i. Listings
   ii. Characteristics
   iii. Mixture, "derived from," and "contained in" rules

Section 3: Accumulating Hazardous Waste—Part I

Generator status and counting Hazardous waste. Five options for accumulating hazardous waste on site.

Question & Answer Period

Day Two

Review of Day One

Section 3: Accumulating Hazardous Waste—Part II

Accumulation options. Satellite, universal, and used oil rules.

Section 4: Land Disposal Restrictions

Determine significant waste codes, choose proper treatment standards, learn about underlying hazardous constituents, and complete a "Land Ban" form.

Section 5: Emergencies and Releases

Preparedness and prevention. Written contingency plans. Release reporting requirements.

Section 6: Off-Site Shipping

An overview of hazardous materials classification; proper shipping names, packaging requirements, shipping papers/Manifest, marking and labeling, and transporters' responsibilities.

Section 7: Management Systems

Notifications, reports, recordkeeping, and training for all phases of hazardous waste management.

Section 8: Common Issues (Reference Only)

As a reference tool, Section 8 will provide you with quick answers to some of our students' most common concerns.

Certification Quiz

ATTACHMENT 18

TRAINING MATERIALS

(10 Pages)

NORPLEX MICARTA
HIGH PERFORMANCE COMPOSITES

RCRA

Resource Conservation & Recovery Act

ILNorplex
Postville, IA

Manufacturing Engineering
Tim Delaney
Deanna Giancaspro
Jon Thorstenson

Monday, March 19th
- 4:15 pm & 5:15 pm

Tuesday, March 20th
- 6:00 am, 7:00 am, 1:00 pm & 2:00 pm

History of RCRA

- The Resource Conservation and Recovery Act
  - In 1976, Congress passed a law known as RCRA, or the Resource Conservation and Recovery Act. RCRA is a comprehensive law designed to manage all sorts of wastes.
  - One part of RCRA regulates what we usually think of as "garbage."
- "Cradle to Grave" Management
  - RCRA also provides a systematic approach to managing "hazardous waste," which is the focus of this course. The law covers the management of hazardous waste from the moment it is created until it reaches its final disposal.
- Resource Conservation
  - One of the primary objectives of RCRA is to conserve valuable material and energy resources by promoting "Reducing," "Reusing" and "Recycling."
- RCRA Limitations
  - RCRA was NOT designed to regulate everything; many other agencies and laws regulate substances and activities.
    - Hazards in the workplace are regulated by OSHA.
    - Hazards during transportation are regulated by the DOT

RCRA Training Requirements

- While following the 90-day option, generators must comply with 40 CFR 265.16, the treatment standard for interim TSDFs.
- Who/What [40 CFR 265.16(a)]
  - "Personnel" must be taught job-specific waste management procedures.
  - Training must be directed by a person trained in hazardous waste management procedures.
  - Training must cover, as applicable and relevant to each person's job responsibilities, the following:
    - Communications
    - Responses to fires & explosions
    - Responses to ground-water contamination incidents
- When [40 CFR 265.16(b) & (c)]
  - Within six months after becoming "personnel"
  - Annual review of the initial training

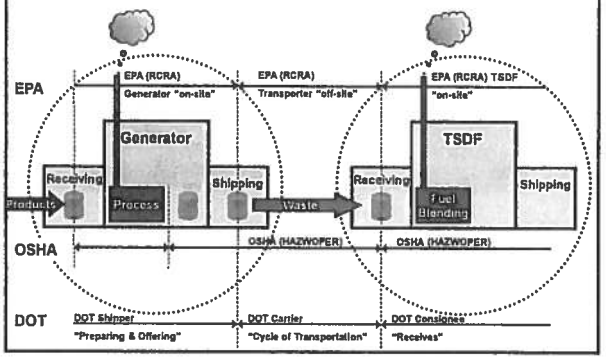
Departments/Personnel Requiring Training

- Treating
- Compounding
- Receiving
- Laboratory Manager
- Lab Technicians
- Manufacturing Engineering / QA Manager
- Manufacturing Engineers
- Product Development
- Facilities Engineer
- Maintenance
- Plant Manager
- Sheeting/Tubing Department Managers
- Shift Supervisors
- Safety Manager
- Shipping Clerk
- Traffic Manager

Regulated "Persons" Per Agency

- Environmental Protection Agency (EPA)
  - Generator
    - "means any person, by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation"
  - Transporter
    - "means a person engaged in the offsite transportation of hazardous waste by air, rail, highway or water"
  - TSDF
    - Treatment, Storage or Disposal Facility
- Occupational Safety & Health Administration (OSHA)
  - Employer
  - Employee
- Department of Transportation (DOT)
  - Shipper
    - Any person preparing or offering a shipment for off-site transportation.
  - Carrier
    - A person involved with the transportation in commerce including loading, moving and unloading.
  - Consignee
    - receiver of a shipment

HazMat Management Jurisdictions



Fines & Penalties

RCRA (Hazardous Waste)	Civil	None	$32,500 / day	----
	Criminal	Knowingly	$25,000 / day (doubled for second offense)	1 year (doubled for second offense)
		Knowing imminent endangerment to human life	$250,000, $1,000,000 organizations	2 years
		Knowing extreme indifference to human life	$250,000, $1,000,000 organizations	5 years
HMTA (Hazardous Materials Transportation)	Civil	Knowingly	$50,000 / day	----
	Criminal	Willfully or unlawful tampering	$250,000 / day (individuals), $500,000 / day (organizations)	5 years

Hazardous Waste Identification

- Step 1: Is it a solid waste as defined in 40 CFR 261.2?
  - Abandoned
  - Recycled
  - Inherently waste-like materials
  - Military munitions
- Step 2: Is it excluded?
  - Household waste
  - Agricultural waste
  - Mining overburden
  - Coal & ash
  - Samples
- Step 3: Is it a hazardous waste?

Step 3: Is it a hazardous waste?

- The regulations at 40 CFR 261.3 state that a *solid waste* that meets any of the following criteria is a *hazardous waste*:
  - Listed in 40 CFR 261 Subpart D
  - Exhibits a characteristic
    - Ignitability
    - Corrosivity
    - Reactivity
    - Toxicity
  - Mixed with listed waste

Waste Mixing

- Mixing wastes to render them nonhazardous is considered treatment and is in direct violation of RCRA standards.
- Any nonhazardous material coming into contact with hazardous waste needs to be handled as hazardous waste.

Hazardous Waste | Nonhazardous Waste | Hazardous Waste

90 Day Accumulation

- In order to be allowed to accumulate hazardous waste on site under the "90-day" accumulation option, generators must meet several requirements:
  - Place the waste in one of the following devices:
    - Containers
    - Tanks
    - Containment buildings
  - Mark the accumulation start date on each container
  - Mark each container with the words "Hazardous Waste"
- If you accumulate hazardous waste on site for more than 90 days, then you must receive an extension from the EPA.
- Contact Manufacturing Engineering if a container is found with an accumulation start date >90 days old.

90 Day Accumulation: Containers

- Generators following the 90-day option are required to comply with all of 40 CFR 265 Subpart I:
  - Keep the containers in good condition
  - Assure that the containers are compatible with material
  - Keep the containers closed during storage and manage them safely
  - Inspect the containers at least weekly
  - Keep containers holding ignitable or reactive wastes 50 ft from the property line
  - "No Smoking" signs must be displayed
  - Manage incompatible wastes properly
  - Comply with air emission standards
- Containers must be grounded whenever waste is being added.

90 Day Accumulation: Containment Buildings

- Generators following the 90-day option are required to comply with all of 40 CFR 265 Subpart DD:
  - Design and operate properly
  - Must be completely Enclosed
  - Must meet certain strength and thickness requirements
  - Must be compatible with the waste
  - Must have appropriate "primary barrier" during operating life
  - Primary barrier to prevent migration of liquid
  - Collection system and practicable liquid waste removal
  - Secondary containment requires for liquids
  - Must repair, record and notify any conditions that could cause or lead to a leak
  - Must inspect and record, in the facility's operating record, every seven days

90 Day Accumulation: Locations

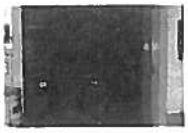
Treater 201

Between Treaters 4 & 6

Treater 208

Treater 209

90 Day Accumulation: Locations



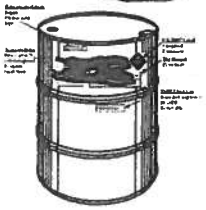
Receiving area

Outside pole shed

Treater wet-end area

Container Preparation

- ☐ Select a container that is in good condition!
- ☐ Select a container that is compatible with the hazardous waste that you will be adding!
- ☐ Destroy the original product labels (black spray painting over them is acceptable)!
- ☐ Make sure that the placard is present, appropriate and in good condition.
- ☐ Apply the appropriate label for the material that you will be adding.



Labeling & Placarding (90 Day)

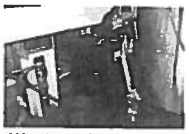
- Placard
  - Diamond-shaped hazard labels that identify the hazard class(es) of the waste.
- Label
  - Waste description
    - Anhydride
    - Melamine
    - Scrap phenolic/epoxy
    - Well Water
    - Scrap Rags
    - Still Bottoms Scrap
  - "Hazardous Waste"
  - Accumulation Start Date

Class 3 Flammable Liquid | Class 4.1 Flammable Solid | Class 8 Corrosive | Class 9 Misc

Satellite Accumulation

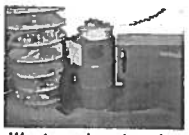
- Generators following the satellite accumulation rules are allowed to:
  - Accumulate up to 55 gallons
  - In approved containers
  - At or near any point of generation, under the control of the operator, where the waste initially accumulates
- Container Management
  - In good condition
  - Compatible with the waste
  - Kept closed except when adding or removing waste
- Upon Exceeding Limits
  - Upon exceeding 55 gallons of hazardous waste, generators must:
    - Mark the container holding the excess waste with the date the limit was exceeded
    - Comply with 90-day rules within three days of exceeding waste limits
- Containers must be grounded whenever waste is being added.

Satellite Accumulation: Locations



Waste resin in upper Compounding

Waste rags in upper compounding



Waste carburetor cleaner in maintenance

Satellite Accumulation: Locations

Waste chemicals adjacent to the laboratory

Engineering waste in the laboratory

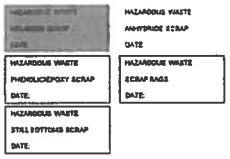
Incoming resin waste in the laboratory

Waste rags in the laboratory

Labeling & Placarding (Satellite)

- Placard
  - Diamond-shaped hazard labels that identify the hazard class(es) of the waste.
- Label
  - Waste description
    - Anhydride
    - Melamine
    - Scrap phenolic/epoxy
    - Scrap Rags
    - Still Bottoms Scrap
  - "Hazardous Waste"
  - DO NOT DATE until 55 gallon limit is reached.

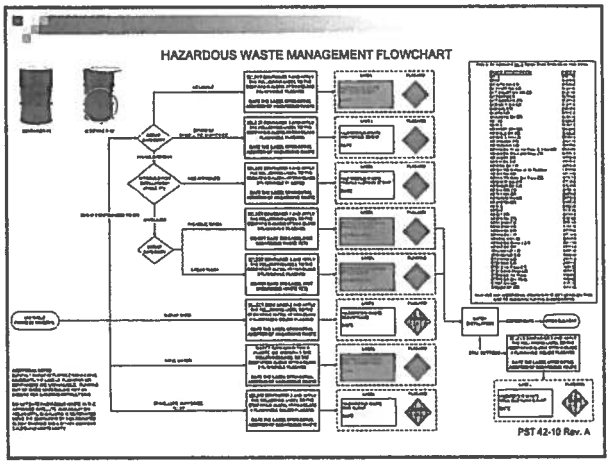
Class 3 Flammable Liquid | Class 4.1 Flammable Solid | Class 8 Corrosive | Class 9 Misc



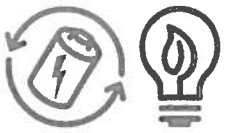
In-Process Material

IN-PROCESS MATERIAL	IN-PROCESS MATERIAL
PHENOLIC WASH	EPOXY WASH
(DO NOT DATE)	(DO NOT DATE)

- Placard...Yes!
- Words "Hazardous Waste"...No!
- Date...No!



Universal Waste



- What are Universal Wastes?
  - Batteries
  - Lamps
  - Mercury-containing equipment
- On-Site Management
  - Waste Management
    - Manage universal wastes in a way that prevents releases to the environment
  - Labeling / Marking
    - Mark the container with the words:
      - "Universal Waste Batteries" or "Waste Batteries"
      - "Universal Waste Lamps" or "Waste Lamps" or "Used Lamps"
      - "Universal Waste Mercury-Containing Equipment"
  - Time Limits
    - Generators may accumulate universal waste for up to one year.
    - Mark the container holding the waste with the initial accumulation date.

Universal Waste: Locations

Waste battery disposal in maintenance office

Waste battery disposal in radio room

Waste lamp disposal in boiler room

- Contact Manufacturing Engineering for:
  - Disposal of waste mercury containing equipment.
  - Addition waste lamp boxes.
  - Long term storage of universal waste when totes are full.

Used Oil

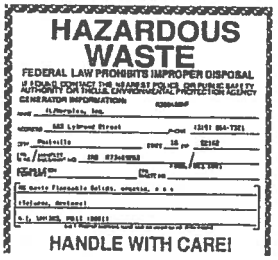
- "Used Oil" is "any oil that has been refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities"
- Used oils that are mixed with hazardous waste are regulated as hazardous waste
- Generators managing used oil must comply with the following:
  - Used oil must be stored in tanks or containers
  - Containers and above-ground tanks must be in good condition and not leaking
  - Used oil storage units must be labeled "Used Oil"
  - Upon detection of a release, a generator must:
    - Stop and contain the release
    - Clean up and manage properly the released oil
    - Repair or replace any leaking tanks or containers
  - Used oil generators are subject to all applicable SPCC (Spill Prevention Control & Countermeasure) rules

Empty Containers

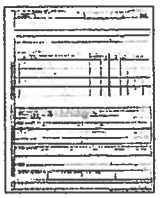
- What's the issue?
  - When is a container "empty"? This depends on whose definition you are looking at.
- RCRA Empty
  - In general, a container holding non-acute hazardous waste is RCRA empty when:
    - All wastes have been removed using methods commonly employed to empty that type of container
    - Less than 1 inch of residue remains in the container
- DOT Empty
  - A package is not subject to any of the hazardous materials regulations if it meets DOT's definition of "empty."
    - The package has been cleaned of residue and purged of vapor such that it is no longer a DOT hazard.
    - Hazardous material communications have been removed, obliterated or covered in transportation.
    - Any remaining residue is neither an EPA hazardous waste nor a marine pollutant.
- 55 gallon barrels
  - Empty 55 gallon plastic and steel barrels are shipped out for reconditioning and recycle as "RCRA empty".
  - Do not black out the original manufacturer label or placards.
  - Stack the barrels in the semitrailer next to the pole sheds.
- 5 gallon pails
  - Empty containers such as 5 gallon pails can be disposed of in the trash compactor only if they are "DOT empty".
  - Empty containers should be completely cleaned out and have any labels or placards blacked out before disposal in the compactor.
  - Ask Manufacturing Engineering for clarification if unsure.

Shipping Label

- Proper shipping name
- United Nations identification number
  - UN1866 Resin solution, flammable
- Hazard class
  - Class 3 flammable
- Packing group
  - PG II: medium transportation risk
  - PG III: low transportation risk
- Shipper or consignee's name and address
- Waste codes
- Manifest number



Hazardous Waste Manifest



- A shipper offering a hazardous waste for transportation is required by the DOT to prepare a hazardous waste manifest in accordance with EPA regulations.
- Anyone who prepares, completes or signs a hazardous waste manifest must have training as required by the DOT's hazmat employee training standard.
  - Only authorized personnel can prepare and sign manifests.
    - Tim Delaney
    - Deanna Glancaspro
    - Jon Thorstenson

Summary of 2011 Inspections

- 63% of the time, during an inspection, some non-compliance will be discovered.
  - When a non-compliance is found, nearly half of the time, it will be some sort of labeling issue.
    - Examples are: no label at all, a label that is dated that should not be, a label that should be dated and is not, use of words other than "Hazardous Waste" and original product labels that are not covered up.
  - In addition to labeling, about one quarter of the time, the non-compliance will be as a result of an open container.
    - Typically this is a case of the container having the lid in place, but not engaged or the lid set aside (possibly someone was filling, stepped away and forget about it)
- Examples of regulatory actions:
  - A company in Redmond, WA who handled acetone, toluene and ethanol was fined $180,000 for having hazardous waste containers that were not properly labeled and not properly closed.
  - A company in North Chicago, IL was ordered to cease storing hazardous waste at its facility unless it fully complies with RCRA requirements after inspections found that waste containers were not properly labeled.

NORPLEX MICARTA
HIGH-PERFORMANCE COMPOSITES

RCRA Hazardous Waste Training Test

March 19-20, 2012

Name_____Date_____

1. **When does process material become hazardous waste?**
   a. When it is no longer usable in production without being treated.
   b. When it is pumped out of the dip pan and into a drum.
   c. When it meets the RCRA definition of hazardous waste.
   d. All of the above.
   e. Both A and C.
2. **A label with the words "Hazardous Waste" should go on a container when,**
   a. The container is full.
   b. Before hazardous waste is first added to the container.
   c. Before the end of your shift.
   d. Within three days of the container being filled.
3. **Hazardous waste containers in satellite accumulation areas such as the lab,**
   a. Must be moved to a 90-day storage area within 5 days of being filled.
   b. Must have a label with the words "Hazardous Waste" on it.
   c. Should be dated when hazardous waste is first added to the drum.
   d. All of the above.
4. **All hazardous waste drums in a 90 day hazardous waste storage area must,**
   a. Have a "Hazardous Waste" label.
   b. Must be dated when hazardous waste is first added to the container.
   c. Must be picked up and removed from site within 90 days of when hazardous waste is first added to the container.
   d. Be placed so that the label is easily viewable.
   e. All of the above.
5. **If today's date was 6/10/12 and you were examining a drum with the date 4/15, would you consider the date to be within the 90-day limit for storage of hazardous waste?**
   a. Yes
   b. No, contact Manufacturing Engineering
6. **A drum is RCRA empty (No longer considered to contain hazardous waste) when,**
   a. The hazardous waste label has been painted over.
   b. Two thirds of the material in the drum has processed through the still.
   c. There is less than 1 inch of material remaining in the bottom of the drum.
7. **It is all right to mix wastes from different waste streams.**
   a. True
   b. False
8. **A hazardous waste drum in a 90-day accumulation area should be dated as soon as it is full.**
   a. True
   b. False
9. **It is OK to leave bungs out when you are not adding hazardous waste to the drum and/or not within the immediate vicinity?**
   a. True
   b. False
10. **When you add non-hazardous waste materials to a drum containing hazardous waste, all the material in the container is considered hazardous waste.**

a. True
b. False

11. **It is OK to use a drum with a hole in the seam as long as the hole is near the top and you don't fill the drum past the hole.**
    a. True
    b. False
12. **The primary characteristic of our waste that makes it hazardous is its flammability.**
    a. True
    b. False
13. **It is OK to use product drums for shipping hazardous waste.**
    a. True
    b. False
14. **The water we pump from the remediation well is considered to be hazardous waste and should be treated the same as our other waste.**
    a. True
    b. False
15. **All open drums of hazardous waste should be grounded.**
    a. True
    b. False

What is wrong with these pictures?

ATTACHMENT 19

JOB DESCRIPTIONS

(Three Pages)

Norplex - Micarta

Compounder

Department: Treaters
Reports To: Shift Supervisor
Grade/Level: High School / GED

Job Status: Full Time

Prepared by: Human Resources

POSITION SUMMARY
This primary function of the Compounder will be to read plant specifications to determine products, ingredients, and prescribed modifications of plant procedures and mix and prepare product for Treater runs.

ESSENTIAL FUNCTIONS

- Measure, weigh and mix chemical ingredients according to specifications.
- Inspect equipment or units to detect leaks and malfunctions and shut down as necessary.
- Control and operate equipment in which chemical changes or reactions take place during the processing of industrial/consumer product.
- Draw Samples of products at specified stages so that analyses can be performed.
- Test product samples for specific gravity, chemical characteristics, pH levels and concentrations or viscosities or send to laboratories for testing.
- Add treating or neutralizing agents to products, and pump products through filters or centrifuges in order to remove impurities or precipitate products.
- Read plant specifications to determine products, ingredients, and prescribed modifications of plan procedures.
- Flush and clean equipment.
- Operate forklift as needed.
- Do accurate paperwork transactions.
- Maintain plant cleanliness and appearance.
- Follow all safety procedures within the plant.

POSITION QUALIFICATIONS
Competency Statement(s)

Education : High School Graduate or General Education Degree (GED)
Experience : Six months to one year related experience

PHYSICAL DEMANDS

Physical Demands		**Lift/Carry**	
Stand	C (Constantly)	10 lbs or less	F (Frequently)
Walk	F (Frequently)	11-20 lbs	F (Frequently)
Handling / Fingering	F (Frequently)	21-50 lbs	O (Occasionally)
Reach Outward	F (Frequently)	**Push/Pull**	
Reach Above Shoulder	O (Occasionally)	12 lbs or less	F (Frequently)
Squat or Kneel	O (Occasionally)	13-25 lbs	O (Frequently)
Bend	O (Occasionally)	26-50 lbs	O (Occasionally)

O (Occasionally)	Occupation requires this activity up to 33% of the time (0 - 2.5+ hrs/day)
F (Frequently)	Occupation requires this activity from 33% - 66% of the time (2.5 - 5.5+ hrs/day)
C (Constantly)	Occupation requires this activity more than 66% of the time (5.5+ hrs/day)

The company has reviewed this job description to ensure that essential functions and basic duties have been included. It is not intended to be construed as an exhaustive list of all functions, responsibilities, skills and abilities. Additional functions and requirements may be assigned by supervisors as deemed appropriate.

Norplex - Micarta

Treater I

Department: Treater
Reports To: Shift Supervisor
Grade/Level: High School / GED

Job Status: Full Time

Prepared by: Human Resources

POSITION SUMMARY

This position's primary function is to prepare and operate the treater. This will require adjusting Treater controls as necessary and taking the required quality checks for the material being treated.

ESSENTIAL FUNCTIONS

- String up and prepare Treater for material run.
- Assists on the Treater Wet Ends.
- Do quality checks as required.
- Operate Treater and adjust cutters as needed.
- Clean the Treater.
- Operate Forklift as needed.
- Do accurate paperwork transactions.
- Maintain plant cleanliness and appearance.
- Follow all safety procedures within the plant.

POSITION QUALIFICATIONS

Competency Statement(s)

Education: High School Graduate or General Education Degree (GED)

Experience: Six months to one year related experience

PHYSICAL DEMANDS

Physical Demands		**Lift/Carry**	
Stand	C (Constantly)	10 lbs or less	F (Frequently)
Walk	F (Frequently)	11-20 lbs	O (Occasionally)
Handling / Fingering	F (Frequently)	21-50 lbs	O (Occasionally)
Reach Outward	F (Frequently)	**Push/Pull**	
Reach Above Shoulder	O (Occasionally)	12 lbs or less	F (Frequently)
Squat or Kneel	O (Occasionally)	13-25 lbs	O (Occasionally)
Bend	O (Occasionally)	26-50 lbs	O (Occasionally)

O (Occasionally)	Occupation requires this activity up to 33% of the time (0 - 2.5+ hrs/day)
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The company has reviewed this job description to ensure that essential functions and basic duties have been included. It is not intended to be construed as an exhaustive list of all functions, responsibilities, skills and abilities. Additional functions and requirements may be assigned by supervisors as deemed appropriate.

Norplex - Micarta

Maintenance Mechanic

Department: Maintenance
Reports To: Shift Supervisor
Grade/Level: **High School / GED**

Job Status: Full Time

Prepared by: Human Resources

POSITION SUMMARY
Perform work involving the skills of two or more maintenance or craft occupations to keep machines, mechanical equipment, or the structure of the building in repair. Duties may involve welding; machining; carpentry; repairing electrical or mechanical equipment; installing, aligning, and balancing new equipment; and repairing building.

ESSENTIAL FUNCTIONS

- Repair or replace defective equipment parts using hand tools and power tools, and reassemble equipment.
- Perform routine preventive maintenance to ensure that machines continue to run smoothly, building systems operate efficiently, and the physical condition of buildings does not deteriorate.
- Use tools ranging from common hand and power tools, such as hammers, hoist, saws, drills, and wrenches, to precision measuring instruments and electrical and electronic testing devices.
- Assemble, install and / or repair wiring, electrical and electronic components, pipe systems and plumbing, machinery, and equipment.
- Diagnose mechanical problems and determine how to correct them.
- Inspect, operate, and test machinery and equipment in order to diagnose machine malfunctions.
- Paint and repair roofs, windows, doors, floors and other parts of building structure.
- Maintain plant cleanliness and appearance.
- Follow all safety procedures within the plant.

POSITION QUALIFICATIONS
Education : Minimum: High School Graduate or General Education Degree (GED)

Experience : 6 months to 1 year related experience and strong electrical background.

PHYSICAL DEMANDS

Physical Demands		**Lift/Carry**	
Stand	C (Constantly)	10 lbs or less	F (Frequently)
Walk	F (Frequently)	11-20 lbs	F (Frequently)
Handling / Fingering	C (Constantly)	21-50 lbs	O (Occasionally)
Reach Outward	F (Frequently)	**Push/Pull**	
Reach Above Shoulder	F (Frequently)	12 lbs or less	F (Frequently)
Squat or Kneel	F (Frequently)	13-25 lbs	F (Frequently)
Bend	F (Frequently)	26-50 lbs	O (Occasionally)

O (Occasionally)	Occupation requires this activity up to 33% of the time (0 - 2.5+ hrs/day)
F (Frequently)	Occupation requires this activity from 33% - 66% of the time (2.5 - 5.5+ hrs/day)
C (Constantly)	Occupation requires this activity more than 66% of the time (5.5+ hrs/day)

The company has reviewed this job description to ensure that essential functions and basic duties have been included. It is not intended to be construed as an exhaustive list of all functions, responsibilities, skills and abilities. Additional functions and requirements may be assigned by supervisors as deemed appropriate.

ATTACHMENT 20

CONTINGENCY PLAN

(11 Pages)

Distribution List

	Copy Number
Master Copy- In HR/Safety Managers office	1
Maintenance office	2
Emergency Response cart	3
Iowa Emergency Response Unit, IDNR, 401 SW 7th Street, Suite 1, Des Moines, IA 50309	4
Postville Fire Department, Postville Iowa 52162	5
Postville Police Department, Postville Iowa 52162	6
Veterans Memorial Hospital, 40 1st street, Waukon IA 52172	7
Allamakee County Emergency Response Committee	8

Attachment 20 Page 1 of 11

ILNORPLEX

EMERGENCY RESPONSE PLAN

Purpose

The Emergency Response Plan is to provide organization and administrative guidance to prevent or minimize damage to company personnel and property in the event of an emergency or disaster. For the purpose of this plan an emergency can be defined as follows:

1. An accident causing fatal or severe injuries;

2. Unexpected operational incidents which may result in fires or explosions;

3. Forces of nature such as severe windstorm, flood, lightning, or earthquake;

4. Any incident which could affect community relations such as accidental release of toxic materials into the atmosphere or local waterways;

5. Deliberate damage from malicious mischief, sabotage, bomb threat, and riots.

All employees in the facility will be familiar with the Emergency Response Plan as follows:

I. Their individual responsibilities for reporting emergencies.

II. The appropriate response when an emergency and/or evacuation are declared.

A review of the above responsibilities will be conducted as a part of the employee orientation and annually there after. All employees who have Emergency Response responsibilities will receive 24 hours of training initially and training adequate to maintain competency annually there after. All training and program reviews will be documented with attendance records maintained for five years.

Emergency Control Organization

When a state of emergency is declared at the Postville Plant, the Emergency Response Organization must be immediately mobilized. Contained within the Emergency Control Organization are assignments for key members of management to insure that immediate decisions are made and carried out in an effective manner.

The Emergency Response Organization is as follows:

Emergency Response Coordinator (ERC)
Dixie Doeppke
205 1st Street
Monona, IA 52159
563-539-4507

Person in charge (Acts as ERC in absence of ERC)
1st shift
Shawn Thurn 563-539-4626
502 S Egbert
Monona, IA 52159

2nd shift
Gaylon Jennings 563-774-3975
15047 Cedar Road
Wadena, IA 52169

3rd shift
Rod Bries 563-539-4230
15224 Falcon Ave
Monona, IA 52159

Activities of the Emergency Response Organization will be directed from a command center. The primary command center is the Maintenance Shop. The following equipment will be located here:

- At least three radios
- PPE (Each team member has their own personal respirator)
- Copy of this manual
- Copies of MSDS's
- Flashlights

I. Emergency Response Assignments

A. The Emergency Response Coordinator is responsible for the implementation of the Emergency Response Plan in the event of a plant emergency or potential disaster. The Emergency Response Coordinator shall make decisions and initiate appropriate action needed to minimize risk and/or damage to plant personnel, property, and the environment.

B. The Person in Charge, under the direction of the Emergency Response Coordinator, will help administer the Emergency Response Plan and in the absence of the Emergency Response Coordinator be responsible for the implementation of the Plan.

C. The Communications Contact is responsible for all personnel matters growing from or in the course of emergency. S/He will direct all matters relative to employee scheduling, casualty reports, public relations, in-plant welfare, and telephone and radio communications.

D. Public Relations

The General Manager, Plant Manager, or Safety Manager after consultation with the Emergency Response Coordinator, will handle all news releases, including plant bulletins and interviews with the news reporters and photographers. The responsibilities include:

1. To periodically provide the various news media with positive information by telephone before newsmen pick up rumors from outside sources and approach the Company on their own initiative. News media to be contacted should include:

   Radio - KOEL (563) 283-1234
   Newspaper - Postville Herald (563) 864-7331

2. To provide meaningful, non-confidential information.

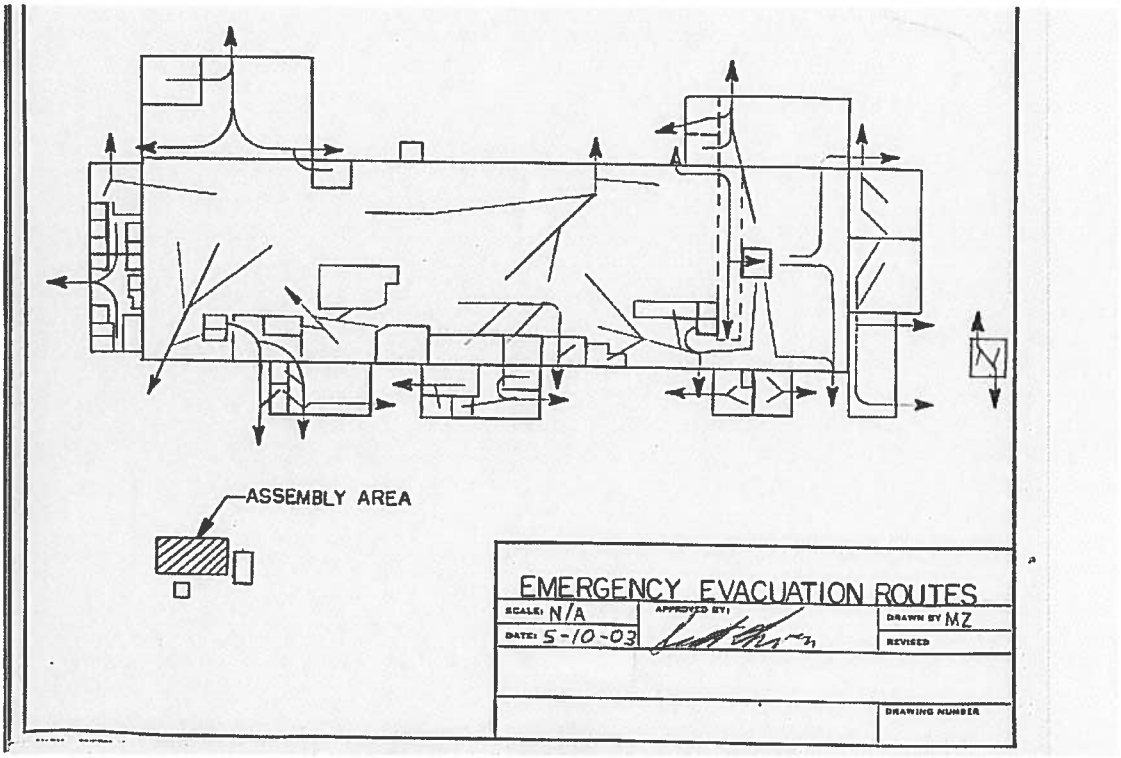
3. To set up periodic news conferences with the press to update available information. No information will be given out prior to the news conferences nor will newsmen and photographers be allowed to enter the plant.

E. Employee Welfare

Assistant Person in Charge (A.P.C) will be responsible for administering to the comfort and well being of employees, including evacuees, disaster workers and the injured. A.P.C. will arrange for preparation and delivery of food and beverages to the first-aid stations, the affected areas, and to the assembly areas.

A.P.C. will provide rescue workers with dry and comfortable clothing as needed. A.P.C. will arrange for necessary blankets, cots, etc. for injured personnel that are brought into the first-aid station or in-plant medical centers. Plant Manager will attend to the details essential to keeping up the morale of the plant personnel.

Below is the Plant evacuation drawing showing multiple exit locations from all parts of the plant.



"You are here" drawings of the above map are posted through out the facility.

Emergency Response Team	*Third shift*	*First Shift*	*Second Shift*
Emergency Response Coordinator	Dixie Doeppke or person listed below	Dixie Doeppke or person listed below	Dixie Doeppke or person listed below
Person in charge:	Rod Bries	Shawn Thurn	Gaylon Jennings
Assistant Person in charge:	John Elledge	Dan Roffman	Les Tieskoetter
Direction:	Paul Erickson	Dave Morel	Ralph Detra
Headcount:	Ron Duvel Donna Erickson	Lowell Houg Don Gullickson	Steve Smock
Response Team:	Don Miller	Jerry Bissell	Randy Hendry
	Darrin Walch	Al Reicks	Daren Shaffer
	Brian Thomas	Luke Wolfs	Warren Barr
	Rick Heins	Dave Palas	Alphonso Rios
	Justin Williams	Tom Benson	Jeff Valley
	Stan Schultz	Terry McNally	Nathan Heins
	Scott Miene	Jeff Joyner	Larry Frey
	Darin Berg	Deanna Giancaspro	Jason Grimes
		Brian Murphy	

EMERGENCY RESPONSE TEAM:

Person In Charge: Will evaluate the severity of the situation, and direct remainder of team in the appropriate response to that emergency. Will decide what outside resources if any are needed. **Primary** consideration should be given to the safety and well being of plant personnel including the ER team. **Secondary** consideration should be given to containing or minimizing damage to plant equipment or material.

Assistant Person In Charge: Shall report to emergency taking direction from Person In Charge. Will fill in as Person In Charge in his absence.

Direction: Shall report to emergency and take direction from Person in Charge. If directed to call outside help (Fire, Ambulance Etc.), Direction Person shall place call then report to parking lot and guide outside response teams to nearest door. When outside help arrives notify Person In Charge by radio. Give radio to person in charge (Firechief etc.) of the outside response team.

Headcount: Person shall first retrieve the radio, the list of employees, and the flashlight from the press office, and then report to Evacuation Assembly Area on the front hillside. When employees report to area divide them into groups by dept. and designate a person from each dept. to take a Headcount. The Headcount person shall report by radio to the Person In Charge immediately.

If you need to report an emergency:

1. **Dial 477 Siren will sound. Stay on phone and announce what and where emergency is.**
2. **State specific nature of emergency. IE: "Fire in the 496 heat treat oven", or " Injured employee requires medical emergency response near large tube winder.**
3. **All non-emergency response employees should evacuate the building immediately if the emergency involves a fire.**
4. **Wait for instructions from Person In Charge for non-fire emergencies.**

Fire/ Explosion	Spill	Name	Work	Home
If needed	If needed	Postville Fire Dept.	911	
If needed	If needed	Postville police Dept.	911	
If needed	If needed	Waukon Hospital	(563) 568-3411	
Yes	Yes* primary	Dixie Doeppke	Ext. 237	(563) 539-4507
Yes	Yes *primary	Jim Gilbert	Ext. 222	(563) 382-2586
Alternate*	Alternate *	Pat Harms	Ext. 220	(563) 539-8085
Yes	Yes	Dave Lensing	Ext. 209	864-7138
If needed	If needed	Dr. McMullan	864-7221	

*** If spill is a reportable quantity Dixie, Jim, or Pat as alternate shall call National Response Center at 800-424 8802**

FIRE/EXPLOSION

If you need to report a fire:

Dial 477 Siren will sound. Stay on phone and announce where the fire is.

IE: "Fire in the 496 heat treat oven". All non-emergency response employees should evacuate the building immediately if the emergency involves a fire.

SPILL

Contact Emergency Response coordinator. Evacuate area/plant (see above) if spill poses fire, explosion, or inhalation hazard.

EMERGENCY EQUIPMENT AVAILABLE AT THE FACILITY

The Emergency response cart is located in front of the Maintenance Office.

Emergency Response Cart	
• 4 SCBA units – max. time of 30 min. For plant search and rescue run thru after emergency	• 2 pairs Neoprene Gloves – for protection from blood borne pathogens
• 4 Class A.B.C. Fire extinguishers – for use in the case of incipient fires	• 2 flashlights – for use in emergencies involving power outages and/or smoke
• 2 sets of protective goggles – for eye from dust and debris	• 1 L.E.L. monitors – to check air quality before entering Confined space
• Safety Harness – for use in overhead work and confined space rescue	• 1 Orange vest – recognition of emergency response team member
• 1 100' rope – for use in confined space rescue	• 1 fire blanket – for use in fire emergencies with victims involved
• 1 Oxygen indicator – for checking air quality for Confined space and LOTO procedures	• 1 first aid kit – for use by emergency response team members at emergency scene
• 2 Emergency Oxygen Kits – for administering oxygen to victims overcome from smoke inhalation	•

- **Fire protection**

  - **CO_2 system in Treater 1**
  - **CO_2 system in the Treater wet end area.**
  - **The entire building is sprinklered per code. The three mains are located in the tank farm, the 301 press room, and the lower woman's rest room**
  - **There are 138 fire extinguishers located throughout the Facility**
  - **Incipient level fire fighting hoses**

- **Spill Control 4 spill control kits are located as follows: 1 in the receiving area, 1 outside of the still room, 1 in the outside barrel storage area, and 1 in the hazardous waste storage area. Spill control kit contents are as follows:**
  - 1 ea over pack drum
  - 2 ea Tyvex Suits
  - 1 ea Flash light
  - 1 ea 15/16" wrench
  - 1 ea Siphon Pump
  - 1 ea Plastic Shovel
  - 2 ea Garbage bags
  - 1 ea tarp
  - 2 ea Bung Wrenches
  - 2 ea pair Neoprene gloves
  - 3 ea 5 gal. Buckets with lids
  - 2 ea pair goggles
  - 2 ea bags Absorbent

EMERGENCIES ON WEEKENDS, HOLIDAYS, OR WHEN PLANT IS NOT IN OPERATION:
Watchmen are immediately to notify the emergency response coordinator and/or one of the "Persons in charge" as listed on page 2&6 of this manual.

III. Traffic Control Inside Plant

A. Only authorized vehicles will be allowed to enter the main gate.
B. Employee's cars must be parked in the parking lots, without exception.
C. Ambulances will report to first-aid unless dispatched to the emergency areas by the officer in charge of the emergency units or the plant physician.
D. Emergency vehicles responding to our requests for help will be directed to the scene of the emergency by the safest, most direct route.
E. Service cars, plant trucks, and engineering equipment will be routed as the situation dictates.
F. Traffic congestion at any point cannot be tolerated.
G. Vendors' vehicles will not be allowed to enter the plant, leave the plant, or move within the plant during a state of emergency unless specifically directed by the Emergency Response Coordinator.

IV. Traffic Control Outside Plant

A. Access roadway to the plant must be kept open for passage of emergency vehicles.
B. All employees reporting to work must park in the employees' parking lot.
C. Control of traffic on public roads will not be undertaken by plant or security personnel. For traffic control on public roads, state and local law enforcement officers will be called.
D. Request for outside traffic control aid will be made through the Emergency Response Coordinator.

V. Personnel Evacuation

All personnel not designated as part of the Emergency Response Organization or Emergency Response Team will be evacuated, if necessary, in an orderly manner as outlined in the Evacuation section of this manual. During the early phase of an emergency, a high priority should be given to accounting for all personnel.

VI. Records

The Plant Manager will be responsible for protecting essential plant records should an emergency occur. He should take whatever precautions and actions are necessary to preserve both hard copy records and data in computer storage.

VII. Emergency Shutdown of Utilities and Operating Equipment

The Maintenance Personnel will be responsible for shutdown and restoration of utilities for the general plant and any localized operating equipment that may require shutdown.

EMERGENCY RESPONSE PLAN IMPLEMENTATION

Implementing the "Emergency Response Plan" or "State of Emergency" is a decision that must be made by the:

1) Emergency Response Coordinator
2) Person in charge

When the Emergency Response Team has been summoned to the scene of an emergency, the leader may declare a state of emergency and order area or facility evacuations, equipment shut down, and utility service shut down if necessary.

When the decision to declare an Emergency Response or State of Emergency has been made, the Emergency Response Coordinator will notify all affected personal via the Emergency Response telephone system **(Dial 477)**

All area supervisors shall have the safety of their people as their prime consideration. If the evacuation signal is sounded, supervisors will evacuate their people at once. The supervisor will be sure the evacuation is orderly and that all people are accounted for. Supervisors will check the people when they reach the assembly location to see that all have been evacuated.

Evacuation

When a state of emergency exists in the plant and an evacuation is necessary, the evacuation plan will be put into effect. Upon receiving the evacuation signal, all personnel will leave the building immediately and proceed to the designated assembly area. Personnel will remain in the assembly area until released by their supervisor or given specific assignments.

When a plant evacuation is in effect, the following provisions must be taken:

1. Unauthorized personnel should not be permitted to enter the damage area.

2. All washrooms, locker rooms, offices, and out-of-the-way places should be checked to insure that all persons have been evacuated.

3. Personnel from other departments who may be in the affected areas must be evacuated along with the persons assigned to the areas.

4. Personnel from the office area who may be in the other parts of the plant at the time of an emergency should report to their departmental assembly area immediately.

5. Personnel should not be permitted to return to their work area until the Emergency Response Coordinator has declared the area safe.

6. All visitors will immediately be escorted to front desk and will be accounted for by referencing the log in book.

7. All building, machinery, equipment and rubble will be left as is and guarded, if necessary, until released by the Emergency Response Coordinator except when it obstructs rescue and fire fighting operations.

8. After the evacuation a head count must be made and an effort made to account for all people involved. The shift designated Headcount employee is responsible for verifying all employees are accounted for; the supervisor will report any missing employees to the Person in Charge. The switchboard operator is responsible for bringing the visitor log to the assembly area to assist with visitor accountability.

9. Personnel should be kept in the assembly areas until assigned specific duties, returned to their departments, or released by the supervisor in charge of the area.

Fire and Explosion

In the event of a fire or explosion, the following procedure will be followed:

I. The person who discovers the fire shall do the following:

   1. If the fire is in an incipient stage and the employee has had fire extinguisher training the employee is to extinguish the fire using the available portable fire extinguishers. Report fire to Emergency Response coordinator.

   2. If the fire is too large to control, or the employee is not trained in the use of fire extinguishers the employee is to immediately insure that all persons in the danger area are warned. The employee is to then activate **the Emergency response System (Dial 477)** and then report to the **Emergency Response Team (ERT)** assembly point to brief the ERT on the location and size of the fire. The employee shall then evacuate the facility to their designated assembly area.

II. The ERT will respond to the affected area and bring emergency equipment that may be needed. At the direction of the ERT Leader utilities may need to be deactivated or isolated. If the emergency is such that the plant ERT cannot control the fire, the ERT Leader will call the fire department and activate the Emergency Control Plan. This may include evacuation of the plant per the evacuation plan on page 7.

III. In the event a fire department response is required a member of the ERT will meet the fire department in the driveway or road approaching the plant and direct them to the area of the emergency.

IV. If a fire occurs in the treater the ERT should secure the treater (ventilation, web travel, etc.) and manually discharge the CO_2 extinguishing system (if it has not yet discharged). The ERT member should assure that all doors are closed and evacuate the area.

V. In the event the sprinkler system is activated due to a fire the riser valve must not be turned off until the ERT leader or fire department has determined the fire is extinguished.

VI. If the emergency coordinator determines that the facility has had a release or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows: Notify Postville police and Fire departments via 911 and if appropriate, the National Response Center at 800-428-8802. BE prepared to give the following information:

- Name and facility address
- Time & type of incident (eg fire, release)
- Name and quantity of materials involved to the extent known
- The extent of injuries
- Possible hazards to human health, or environment, outside the facility

RCRA Hazardous Waste Contingency Plan

1. The purpose of this plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The contingency plan should be invoked whenever a hazardous waste emergency could threaten human health or the environment.
2. The Hazardous Waste Contingency plan will follow the Emergency Response plan as detailed in other parts of this procedure.
3. The Postville Fire and Police departments have agreed to support ILNorplex in responding to any disaster that may threaten our facility including fire and explosion. Veterans Memorial Hospital has an emergency response committee that is familiar with our facility and the kind of injuries that we might present to them in an emergency.
4. Names, addresses, and phone numbers fore all persons qualified to act as emergency response coordinator are listed on page 2 of this manual.
5. This procedure is distributed per the list located on page 1 this procedure.
6. This procedure shall be reviewed and amended if necessary per 49CFR265.54
7. Those qualified to act as Emergency Response Coordinator are as listed on page 2 in this procedure.
8. Emergency procedures:
9. Follow the same procedure for hazardous/flammable liquids emergencies detailed else ware in this manual with the following additions:
10. Immediately after an emergency, the emergency coordinator must provide for storing, or disposing of recovered waste, contaminated soil or surface water, or any material that results from a release, fire, or explosion at the facility.
11. Incompatible wastes/materials must be kept separate during cleanup and disposal. All emergency equipment used for the clean up must be rendered fit for use or replaced before operations in that area may resume.
12. Following an emergency involving hazardous waste that requires the implementation of the contingency plan, the emergency response coordinator shall notify the appropriate authorities per 40cfr.265.56(d)

Spill Response

In order to ensure timely and effective response to hazardous material spills, all plant personnel must have an awareness of and involvement in, spill response situations.

Most plant personnel will only be involved in recognizing a spill and reporting it immediately to the lead member of the Emergency Response Team. To that extent, it is not appropriate for any plant personnel to be involved beyond this level unless they are a member of the Emergency Response Team and have been properly trained in emergency response situations.

Refer to the SPCC, Oil and Chemical Spill Plans for further details regarding spill response.

DOCUMENT CONTROL SHEET

DOCUMENT CONTROL CHECK SHEET

Media:

Air	RCRA	Water	Other
	✓		

Date of Inspection: 5/14/12

Facility/Site Name and Location: INDUSTRIAL LAMINATES/NORPLEX INC. 665 LYBRAND STREET POSTVILLE IA 52162

IA	KS	MO	NE
✓			

Document		Yes	No	NA
Final Report w/attachments	241 ~~242~~ Pages	(✓)	( )	( )
Field Sheets	0 Pages	( )	( )	(✓)
Chain-of-Custody Records	0 Pages	( )	( )	(✓)
Field Notes	5 Pages	(✓)	( )	( )
Analytical Data Sheets	0 Pages	( )	( )	(✓)
Photographic Negatives	0 Pages	( )	( )	(✓)
Photographs (not included w/report)	2 Pages	(✓)	( )	( )
Pre-inspection Packet	0 Pages	( )	(✓)	( )
Other Documents (list below)		(✓)	( )	( )
CD-ROM WITH PHOTOS	1 DISK ~~Pages~~			
	____ Pages			
	____ Pages			

(Note: If additional space is needed to list specific documents, use the reverse side of this page.)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Heather K. Wood
Activity Leader's Signature

~~6/19/12~~ 6/20/12
Date Signed

TETRA TECH

CLIENT _____ DATE 5/14/12

JOB TITLE _____ JOB NUMBER _____

SUBJECT Industrial Laminates BY _____ SHEET 1 of 5

905
Tim Delaney - Product Dev. Eng - 4 yrs
Alan Johnson - Plant Manager - 9 yrs

raw material from back to front of plant
phenolic resin } in bulk — 3 or 4 kinds of phenolic
epoxy resin } — 1 bulk tank
remaining materials in drums
solvents also in bulk (and drums)
raw materials piped to compounding areas — one
① for epoxy (#1) ② epoxy (#9) and ③ all other (upstairs)
approx a dozen mixing vessels upstairs → waste
2 vertical treaters (impregnators) — #1 + #9 (fiberglass)
6 horizontal treaters — interchangeable but tend to specialize machines

melamine
silicon

sheets go through rollers — sheets go into oven
material recirculates through pan
stacks - thermal oxidizers ⇒ no scrubber medium

sheets stacked + pressed — cut + shaped

constantly adding → when done pumped out into waste drum — clean pan w/acetone or hot water (melamine only)
acetone → goes to the still
melamine water → shipped offsite

scrap from cutting → goes to water

cutting + grinding — some sludge from materials

no printing or painting

$ SAAs
96 90 day CSAs
one area in maintn, one in server room - batteries
boiler room - lamps
when containers full taken to pole shed

used oil in tank

TETRA TECH

CLIENT _____ DATE 5/14/12

JOB TITLE _____ JOB NUMBER _____

SUBJECT Industrial Laminates BY _____ SHEET 2 of 5

batteries - storage in server room - 3/c full - Retrofit

SAA in maint - Parts washer - waste solvent comes from PW into drum

used oil - tank - collected by S-K - lubricating equip

** used oil filters - draining into little tank which isn't labeled

used lamps - all labeled + dated

** container of HID lamps open

second container of U.W batteries in maint office - labeled + dated 6/22/11

treater #1 CSA - drum w/ HW "anhydride scrap" →
treater #1 nearby
drum w/ in process waste
waste from there goes to lean shed for collection
all closed labeled, dated
spill kit nearby
fire extng across from hall, sprinklers
telephon in lunch room
inspected at least every 7 days

in process material

still room CSA scrap
phenolic epoxy - 2 drums, dated 5/10/12 + 5/11/12
bag work rags - 5/4/12 - general clean up of equip - 4/18/12 container
still bottoms - 5/4/12
in process material - 4 containers
phenolic epoxy scrap - oldest dated 5/8/12
anhydride scrap - 4/26/12
all closed, labeled, dated
fire extinguisher

still in run - every day to once a week
reclaimed solvent ran back out
spill kit just outside door

still pumped to tank

TETRA TECH

CLIENT _____ DATE 5/14/12

JOB TITLE _____ JOB NUMBER _____

SUBJECT Industrial Laminates BY _____ SHEET 3 of 5

CSA - Treater 4-6
rags - 5/9/12
phenolic epoxy scrap - 5/14/12
anhydride scrap - 5/2/12
"in process" - 2 containers - one epoxy, one phenolic
melamine scrap - 5/12/12 - "Tac" aka melamine water
spill kit just outside
phone in hall way
inspected weekly

well water CSA - 4/23/12
tote
usually do 3-4 totes every 90 days
this is not a normal amt - they had shut off pump for this sampling event

CSA - Treater #8 - no photos
only 1 container of in process waste
normally would have a HW container as well
inspected weekly
fire extinguisher

CSA - Treater #9 - no photos
still bottoms - 5/2/12 → not really bottoms, actually particulate from mixing
rags - 5/2/12
phenolic epoxy scrap - 4/12/12
in process epoxy
fire extng
spill kits - central kits

PW near treater #9 - acetone
when spent pumped into drum that would go into treater #9

SAA in upper compounding - 7 gallon container rags
labeled, closed - no photos

tank in upstairs compounding - labeled as "ace wash" - using all of it - but DSR virgin solvent
200 gallon tank

TETRA TECH

CLIENT ______ DATE 5/14/12

JOB TITLE ______ JOB NUMBER ______

SUBJECT Industrial laminates BY ______ SHEET 4 of 5

lean shed CSA			
spill kit			
88 drums			
mel scrap	~~||||~~ ~~||||~~ ||		~~4/5~~ 4/19
phenolic epoxy scrap	~~||||~~ ||		~~4/3~~ 4/27
still bottoms	|||		3/30
rags	~~||||~~ |		~~4/5~~ 3/14
HW resin solution	~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~		~~4/2~~ ~~3/10~~ 3/29

"HW resin solution" is everything but rags + still bottoms, mel. waste anhydride scrap 5/3/12

2 fire extinguisher
phone in adjacent room

empty drums – Consolidated Container – collected every 2-3 mo
~~Rochester~~ Twin Cities

** pole barn #1 – lamps – all labeled + dated – one not closed
ballasts

lab waste SAA –
4 1-gallon containers of bases
~~#~~6 1-gallon containers of acids
all labeled + closed
all dated 9/2009 → just outside lab, also where product stored – used by testing lab for chemical storage
product testing lab – 3 containers for components + all labeled + closed

manifests – only 1 year of hard copy here – older are scanned + emailed to John ~~Fostenson~~ Thorstenson

waste determin starts w/MSDS – mixing ratios – figure out which waste stream – do we need a new waste code, waste profile

acetone, ~~MEK~~, toluene solvents for cleaning – pure solvents
MEK in some mixes, DMF, methanol + ethanol

TETRA TECH

CLIENT _____ DATE 5/14/12

JOB TITLE _____ JOB NUMBER _____

SUBJECT Industrial Laminate BY _____ SHEET 5 of 5

used oil being collected as "oily water" — 3000 gal in 2012 to date
parts washer 1 - 3-4 x/yr

Dixie
Alan
~~Paul~~ Pat Haines - Facility Eng
Dave Lensing - Prod. Mgr

PHOTO LOG
PHOTOGRAPHS NOT USED IN REPORT

Facility Name / City: Industrial Laminates/Norplex Inc.
665 Lybrand Street
Postville, Iowa
Facility ID #: IAD073489288
Date : May 14, 2012
Photographer: Heather Wood
Type of Camera: Canon Powershot SX130 IS, Serial # 112062054881.
Digital Recording Media: Flashcard
All digital photos were copied by: Heather Wood on May 18, 2012.
All digital photos were copied to: Tetra Tech EM Inc. desktop computer
Original copy is stored in: Tetra Tech EM Inc.'s internal office server. Digital photos were downloaded to server by Heather Wood. No changes were made in the original image files prior to storage on the server.

Report Photo #	Photographer	Date	Approx. Time	File Name	Description
1	Heather Wood	5/14/12	944	IL_033.jpg	This photograph was not used for the report.
2	Heather Wood	5/14/12	1047	IL_034.jpg	This photograph was not used for the report.

Industrial Laminates/Norplex Inc.
Postville, Iowa
Photographs Not Used in Report

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph was not used for the report.	1
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph was not used for the report.	2
	CLIENT	U.S. EPA	Date 5/14/12
	PHOTOGRAPHER	Heather Wood	


RPLEX
CARTA


369847 N-BUTYL ALCOHOL
FLAMMABLE LIQUID
3


HAZARDOUS WASTE
ANHYDRIDE SCRAP
5-12-12
FLAMMABLE LIQUID
3
PROCESS MATERIAL
EPOXY WASH
(DO NOT DATE)
FLAMMABLE LIQUID
3


IN-PROCESS MATERIAL
EPOXY WASH
(DO NOT DATE)
FLAMMABLE LIQUID
FLAMMABLE LIQUID
Araldite™ 8569-EA-57 RESIN


CAUTION


HAZARDOUS
WASTE RESIN
FLAMMABLE LIQUID
3
HAZARDOUS
WASTE


CAUTION
ATTACH
GROUNDING
WIRE CLIPS
34


FLAMMABLE LIQUID

BASES


HAZARDOUS WASTE
FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERATOR INFORMATION:
HANDLE WITH CARE!
BASES


HAZARDOUS WASTE
FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERATOR INFORMATION:
NAME: INDUSTRIAL LAMINATES NORPLEX
ADDRESS: 665 LYBRAND ST
CITY PUTVILLE STATE IA ZIP 5211
EPA ID NO. IAD073489288
EPA WASTE NO.
SATELLITE
ACCUMULATION START DATE 9-9-09
MANIFEST TRACKING NO.
Ethylene Dichloride UN1184
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!

952

FOR USED OIL ONLY
Do not place any materials
other than used oil into this tank.


HAZARDOUS
WASTE
DO NOT MIX WASTE NAPA
CARBURETOR CLEANER,
#6406, WITH ANY OTHER
FLUID
(WASTE OILS, WASTE
SOLVENTS, etc.)


ROGEN
Waste Lamps
12-22-11
Waste Lamps
12-22-11
S FOR RECYCLING
TRC
-274-1309

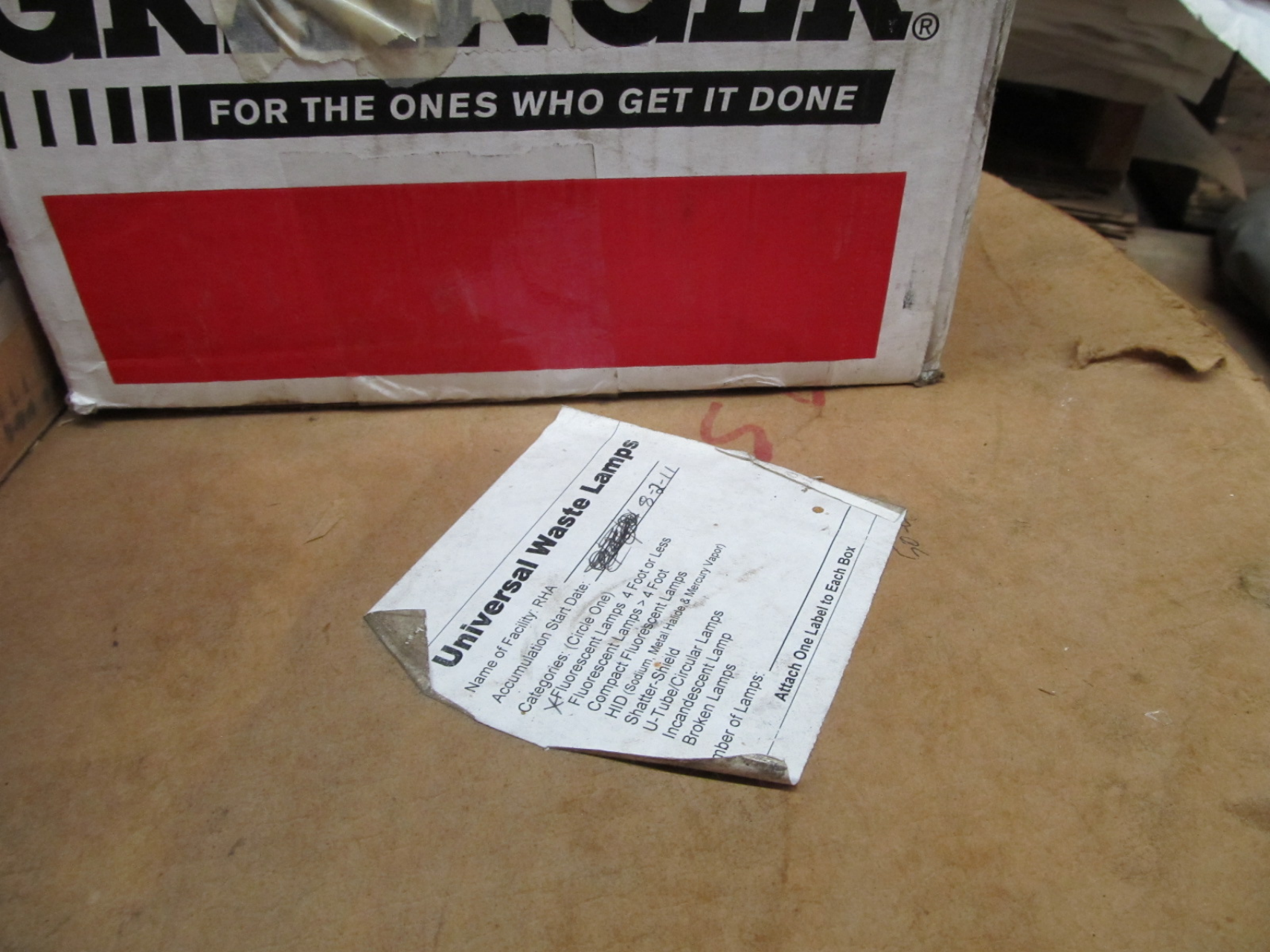
WASTE LAMPS
START 3-12-12


WASTE Bulbs
Flourcent LAMPS
RETROFIT ELECTRIC
LIGHTING RETROFIT
TRC
THE RETROFIT COMPANIES
RETROFIT SUPPLY
RETROFIT RECYCLING
RETROFIT RECYCL
1-800-274-
Universal Waste Spent Flu
Accumulation Start Date:
WASTE Bulbs
3-1-12


WASTE
LAMPS
USED LAMPS FOR RECYCLING
THIS BARREL IS THE PROPERTY OF
RETROFIT RECYCLING
TRC
1-800-274-1309


RETROFIT RECYCLING, INC.
1-800-274-1309
Universal Waste Spent Fluorescent Lamps
Accumulation Start Date:
LIGHTING RETROFIT
RETROFIT ELECTRIC
RETROFIT RECYCLING
TRC
THE RETROFIT COMPANIES
RETROFIT SUPPLY
Waste Lamps
WASTE LAMPS
FRAGILE


RETROFIT RECYCLING INC.
1-800-274-1309
Universal Waste Spent Fluorescent Lamps
Accumulation Start Date:
LIGHTING RETROFIT
RETROFIT ELECTRIC
TRC
THE RETROFIT COMPANIES
RETROFIT RECYCLING
RETROFIT SUPPLY


FOR THE ONES WHO GET IT DONE
Universal Waste Lamps
Name of Facility: RHA
Accumulation Start Date:
Categories: (Circle One)
X Fluorescent Lamps 4 Foot or Less
Compact Fluorescent Lamps > 4 Foot
HID (Sodium, Metal Halide & Mercury Vapor)
Shatter-Shield
U-Tube/Circular Lamps
Incandescent Lamp
Broken Lamps
Attach One Label to Each Box


WASTE ~~BULBS~~ LAMPS
8-10-11
ACC. START
DATE
UPS GROUND
TRACKING #: 1Z 477 147 03 0532 0066
BILLING: P/P
ORDER # 9046263
PO#:23565-
SHIP IL NORPLEX INC.
TO: PAG 23565
665 LYBRAND STREET
POSTVILLE IA 52162
47 LBS 1 OF 1
IA 521 0-01
IL NORPLEX
665 LYBRAND ST
POSTVILLE IA 52162
P:MAIN S:BACK I:
10-FL3
1Z4771470305320066


UNIVERSAL
WASTE
BATTERIES
Universal Waste
Batteries
Accumulation
Start Date
6/22/2011


CP 1
HAZARDOUS Waste
WELL Water
4-23-2012
FLAMMABLE LIQUID
275
250
225
150
125
100
50


ALVAG


EXIT
FIRE
EXTINGUISHER
32
TAYLOR
F


WASTE
SALVAGE
NO SMOKING


W
G
44
44


HAZARDOUS
WASTE
DO NOT MIX WASTE NAPA
CARBURETOR CLEANER,
#6406, WITH ANY OTHER
FLUID
(WASTE OILS, WASTE
SOLVENTS, etc.)


WASTE
Blankets
• High performance
• Easy-to-apply
• Fast project turnaround
• Long lasting protection
251763
G16141
<250 g/l VOC
WASTE Blankets
UC400036735
IA 521 0-01
GROUND
FOR THE ONES WHO GET IT DONE